DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
REGION 1
10151 CROYDON WAY
SACRAMENTO, CA 95827-2106
(916) 855-7700

INSPECTION REPORT

Capital Drum
749 Berry Street
Roseville, California 95678

Inspection By: Carolyn V. Tatoian Cain
Date of Inspection: November 29, 1989
Date of Report: December 19, 1989

I. Purpose

Annual Compliance Evaluation Inspection.

II. Representatives Present

Victor R. Kane, Manager, Capital Drum, Inc.

Steve Mosto, Owner, Capital Drum, Inc.

Carolyn V. Tatoian Cain, Hazardous Materials Specialist, Department of Health Services / Toxic Substances Control Program/ Region 1 (DHS/TSCP/Region 1).

Keith Kihara, Hazardous Materials Specialist, DHS/TSCP, Region 1.

Linda Hennessy, Hazardous Materials Specialist, DHS/TSCP, Region 1.

III. Owner/Operator

Capital Drum, Inc. (CDI) is owned and operated by Steve Mosto. The property is also owned by Steve Mosto.

IV. Background

CDI is a reconditioner of empty drums. All drums reconditioned at this facility were used to hold food products. CDI also acts as a broker of hazardous materials drums and hazardous materials drums are sometimes stored at this facility. CDI has been in business since 1985 and was originally located at 1701 PFE Road in Roseville. CDI moved to its present location in February 1988.

V. General Description of the Facility

CDI is located on a 12 acre parcel in an industrial area in the city of Roseville. The entire parcel is fenced with chain-link fencing. One building is located on the northeast corner of the parcel. This building originally housed a foundry. The front part of the building is used as an office by CDI. A door from the office leads into the warehouse which is constructed of corrugated steel. All drums are reconditioned in the warehouse with the exception of the hazardous materials drums which are sent to drum recyclers in the Bay Area and Southern California.

CDI converts 16 and 18 gauge food drums to 17H drums that are used in the hazardous materials industry. These drums are re-sized and new heads are placed on the drums in order for the drums to meet 17H specifications. The drums are cleaned using cold water at high pressure. The waste water from this process is screened using a filtration system with the solid food particles going to a class three landfill and the water being released to a septic tank.

CDI occasionally brokers hazardous materials drums and has a drum acceptance policy (Attachment 1). This policy states in part that CDI will not accept any drums with more than an one inch of product within each drum. The company selling drums to CDI must sign a statement to that effect. CDI sends a driver out to pick up these drums. The driver checks each drums to verify the drum is empty. If any drum is not empty the CDI driver will reject it.

Once at the CDI yard another person will check the drums to verify the drums are empty. The drums are then unloaded on to a concrete pad to be stored. CDI then arranges with one of four drum recyclers to have these drums cleaned. The drum recyclers doing business with CDI are as follows; Myers, Cooper, Pacific Coast, Waymire. CDI will either sell the drums to the drum recyclers or have them cleaned and return to CDI.

VI. Hazardous Waste Activity Description

CDI generates used oil on the site from equipment maintenance. The used oil is stored in 55-gallon drums that are placed on a concrete pad. Ramos Oil picks up the used oil from the site once CDI has accumulated 200 gallons or within 90 days of when CDI started accumulating used oil.

CDI also maintains a water wash paint booth on site. This system is designed to bring down the over sprayed paint. The water and paint are stored in a 120 gallon tank below the paint booth. The water is recycled though the system and the paint settles to the bottom. The paint booth must be cleaned out when water delivery to the curtain is no longer efficient. CDI has arranged to have EMC a consulting firm do a waste determination on the paint waste and the water in the paint booth as this is the first time the paint booth will be cleaned out since CDI begun painting drums.

VII. Violations

Title 22, California Code of Regulations (Cal. Code of Regs.), Section 66508 (a)(2):

CDI had two drums containing used oil that were not marked with the period accumulation begun.

Title 22, Cal. Code of Regs., Sections 66508 (a)(1) and 67140, 67144:

CDI lacks a contingency plan and an emergency coordinator as required.

Title 22, Cal. Code of Regs., Section 67105:

CDI does not have a training plan to ensure that personnel recieve a complete program of classroom instruction or on the job training that teaches them to perform their duties in a way that ensures the facility's compliance with requirements of this chapter.

VIII. Observation

I arrived at CDI at 0850 hours accompanied by Hazardous Materials Specialist (HMS) Keith Kihara and HMS Linda Hennessy. We started the inspection by walking behind the site to see if any drums were outside the fenced area and to get an ideal about CDI overall housekeeping practices. Once we had finished our initial inspection of CDI we went into the office where we were meet by Victor Kane, manager of CDI and Steve Mosto, owner of CDI.

We first conducted an opening interview where I asked Mr. Kane to describe the operation at CDI. Mr. Kane responded by explaining that CDI converts 16 and 18 gauge drums to drums that can be used in the hazardous materials industry. The drums are resized and the seals are checked and new heads are placed on the drums. The drums to be reconditioned are purchased from the food processing industry. Among the biggest suppliers of drums to CDI are Campbell Soup, Del Monte, and Contadina. We also saw drums from Coca-cola, Nestle, Carnation and Dole. The drums are cleaned by using a cold water rinse process designed by Mr. Kane. Cold water is used because it does not disturb the seals in the drums. Waste water from the drum cleaning process is screened and released to a septic tank. The solid particles are separated using a filtration process and placed in a fiber barrel and disposed at a class three landfill. Because the drums are used in the food processing industry most of them have a FDA type lining that according to Mr. Kane is better than what is required by DOT for hazardous materials drums.

I then went on to ask Mr. Kane if CDI handled any drums that had contained hazardous materials or hazardous waste. He replied by telling me that CDI occasionally brokers hazardous materials drums, but does not recondition them on site. CDI has a drum acceptance policy (Attachment 1). This policy states in part that CDI will not accept any drum with more than one inch of product within each drum. A company selling drums to CDI must sign a statement to this effect. When CDI sends out a driver to pick-up drums the driver will check each drum to verify the drums meet CDI criteria. The driver also carrys extra bungs and buckets. Once in the yard the drums are checked again. Then the drums are segregated and placed on a concrete pad. CDI then arranges with one of four drum recyclers to have these drums cleaned off site or sell the drums to the drum recyclers.

We then asked Mr. Kane to explain the painting process. He stated that CDI uses a water wash paint booth that was designed by Brinks Co. in South San Francisco. This system uses a water curtain to pull the paint mist and overspray down into a tray below the paint booth. The water is recycled while the paint settles to the bottom. The tray holds approximately 120 gallons and must be cleaned out when the water delivery to the curtain is no longer efficient. CDI is planning to clean out the tray around the first of the year. The water and paint will be placed in 55 gallon drums and EMC, an environmental

consulting firm will do a waste determination and then the contents of the tray will be disposed of as hazardous waste.

Also during the opening interview Mr. Kane told us that CDI is located on a 12 acre parcel. CDI currently has nine tractors and 70 trailers. CDI employs 30 full-time employees.

We next went on a site tour of CDI with Mr. Kane. The first place we observed was the waste oil accumulation area. There were six drums of waste oil in this area on a concrete pad with absorbent placed on the concrete. Four drums were properly marked, however two of the drums were lacking accumulation dates on the labels. I also noted some oil staining on the concrete pad. I asked Mr. Kane about the missing accumulation dates and the oil staining. He replied that this was probably an error by the mechanic he would see that it got corrected immediately.

The next place we inspected was the yard which is completely covered by concrete. There we observed numerous stacks of different types of drums. All the drums were sorted by type and condition. We did not observe any staining on the concrete. While in the yard Mr. Kane showed us some equipment he hoped to integrate into CDI operation sometime in the future. This equipment included a caustic drum rinser, sandblaster, and an incinerator.

The paint storage area which contains two types of paints is enclosed within the yard. The first type of paint is used to maintain the building and the trailers. This paint was purchased from U-Haul. The second type of paint is used in the paint booth. All the paints are kept in a shed constructed of wood with an aluminum roof and one side of the shed is open with fencing and a locked gate.

I observed several trailers within the yard. I asked Mr. Kane what was inside these trailers. Mr. Kane responded by telling me that the trailers were full of drums because CDI reconditions drums in the morning and unload drums in the afternoon. Mr. Kane also told us any trailers stored outside the fenced yard contain either new drums or the trailers are empty.

We next inspected the warehouse where the drum reconditioning takes place. In the warehouse we observed the drum painting process. A drums is loaded on to a

conveyer belt and travels towards the paint booth. Once in front of the booth the drum drops in a slot which causes the drum to spin while it is being painted. A worker using an airless paint sprayer paints one drum at a time. Mr. Kane told us it takes one and one-half hours to paint 400 drums. Also while we were in the warehouse we saw the other reconditioning equipment which included the de-denter, leak check bath, rinsers and the washer that Mr. Kane designed. We observed the filtration system that separates the water from the solid materials in the wash area.

After we concluded our site tour we went back into the office to do a record review. We first reviewed CDI records to verify that their hazardous materials drums did go to an outside source to be cleaned. We next reviewed manifests generated by CDI when they were located at the PFE road site. Trip tickets from Ramos Oil were reviewed to verify that the waste oil was properly handled and was not stored on site longer than 90 days. HMS Kihara reviewed all of the business records for CDI for the last two years. We asked to see an employee training plan and an emergency training plan and were told by Mr. Mosto that CDI did not have either type of plan.

We concluded our inspection with a closing interview with Mr. Mosto where we discussed the violations we noted and made some suggestions as to how better manage his hazardous waste.

IX. Discussion with Management

We conducted a closing interview with Mr. Mosto. During this interview we told him that we noted several violations. The first violation that we discussed with Mr. Mosto was the fact that two of the waste oil drums were missing accumulation dates. Mr. Mosto indicated that he would take care of marking these drums right away. Other violations discussed were the lack of an employee training plan and the lack of a facility emergency plan. Also we told Mr. Mosto in addition to an emergency plan he needed to appoint an emergency coordinator. Mr. Mosto stated his business had expanded so fast he had not found the time to prepare these plans. Also the local fire department had lead him to believe CDI did not need any emergency plans. We concluded the discussion by thanking Mr. Mosto and Mr. Kane for their time and we left the facility.

X. Sample Results

No samples were taken.

XI. Attachments

1. Drum Acceptance Policy, 3 pages

2. Photographs, 5 pages

Carolyn V. Tatoian-Cain, Hazardous Materials Specialist

12-19-89
Date Submitted

Mark E. Leary, Senior Hazardous Materials Specialist

12/19/89
Date Approved

ATTACHMENT 1

CAPITAL DRUM, INC.

METAL • PLASTIC • FIBER
749 BERRY STREET
ROSEVILLE, CALIFORNIA 95678
(916) 781-2775

Dear Drum User,

Current environmental laws and regulations govern the practices followed in the disposition of used, empty, steel or plastic drums. Under the Resource Recovery and Conservation Act and the Comprehensive Environmental Response, Compensation and Liability Act, empty drums must be carefully managed by both drum users and recyclers.

To ensure that all necessary measures are followed, we have prepared this "Drum Acceptance Policy". We trust you will understand why we must follow these policies without exception. Please note that in some cases we pay for drums picked up; in others we must charge. Please do not call for a pick up unless you are familiar with our pricing.

You should also note that there may be steps you can take to maximize your revenue (or minimize your costs). Significant savings can be realized if you specify products in all 16-gauge steel drums instead of lighter ones. Another example is to accumulate drums until a higher "quantity break" is reached. (However, we do not recommend holding drums beyond six months; the deterioration will probably offset the higher quantity pricing.) Note that disposition of junk drums is costly -- caution your personnel to handle drums carefully to minimize damage. (Junk drums must still be processed and cleaned before they can be recycled as scrap steel.)

When changes occur in the regulations, we will make every effort to keep you informed. Thank you for your business.

Very truly yours,

DRUM ACCEPTANCE POLICY

The following presents the policies covering the pick up, transportation, purchase of or charges for, used empty steel and plastic drums accepted by us.

These policies reflect the current status of applicable regulations published by the U.S. Department of Transportation (DOT), and the Environmental Protection Agency (EPA).

DRUMS MUST BE EMPTY

We will accept no drums that are not empty. We understand that some minor residue of the drum's prior contents will remain after normal emptying. How much is acceptable is decided by EPA's definition of an "empty" container (40 CFR 261.7). This regulation says: first, that the drum is as empty as it can be gotten using "...the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping...", but second, that in no event may there be more than one inch (or 3 percent by weight) of residue left in the drum.

Note that different types of products require different degrees of emptying (solvent vs. paints, for example). Note also that the "one-inch" rule applies only as an open limit; IT DOES NOT AUTHORIZE ALL DRUMS TO HAVE ONE INCH OF RESIDUE. The first part of the regulation must be met; the drums must be as empty as they can be gotten using normal methods. With all but very few products (like tars, etc.), this will result in far less than one inch of residue. As a practical manner, the rule means that if an opened drum is turned over, only a few drops will come out. The drum should be "drip dry."

DRUMS MUST NOT HAVE CONTAINED "ACUTELY HAZARDOUS CHEMICALS"

The EPA has published -- at 40 CFR 261.33(e) -- a list of chemicals whose residues are considered to be "acutely hazardous."

We will pick up drums containing any of the products on EPA's 261.33(e) list ONLY by special arrangements. Drums must be "triple rinsed" by the emptier in accordance with 40 CFR 261.7(b)(3) and a special certification to that fact completed. Contact our office for information.

DRUMS MUST BE PROPERLY PREPARED FOR TRANSPORTATION

The DOT requires that an uncleaned empty drum must be shipped:
a) with "all openings including removeable heads and filling and vent holes tightly closed...": and
b) with the original label (describing the drum residue) legibly in place (49 CFR 173.29(a)).

Our drivers carry extra drum plugs on their trucks and will replace plugs, if necessary, to enable pick up. Costs for such plugs are published in the attached quotation.

There is no DOT placarding requirement for vehicles transporting empty drums (49 CFR 173.29 (a)(3)(i)). Also, empty drums picked up by our trucks (or delivered by your trucks or contract carriers to our plant) are exempt from the DOT shipping paper requirement, because such drums are "collected and transported for... reconditioning and reuse" (49CFR 173.(a)(3)(ii)).

CERTIFICATION OF THESE REQUIREMENTS BY SHIPPER

We can pick up only after the shipper (on every load) certifies compliance with the above requirements. This certification appears on our drum receiving tickets (a copy of which is left with you after pick up.)

INSPECTION

Drums are inspected at our receiving yard. Drums vary considerably in their reuse value due to many factors. Some major ones are:
1) gauge of metal of construction;
2) DOT Specification status;
3) nature of residues of previous contents, difficulty of removal, and steps necessary to handle safely and dispose of these residues;
4) degree of damage and overall condition.

Because of one or more of these factors, some drums are "non-economic" and we must charge for their proper disposition. Due to strict environmental regulations, these drums must first be cleaned before the drum carcass may be sent to a steel scrap recycler. For this reason, charges will be made for certain low value drums and for drum disposal.

LOADING

Our drivers will stack and load drums in their trailers. Our offer to pick up drums is based on suppliers placing the drums "on the tailgate." In cases where a trailer is "dropped" atthe supplier's plant, all loading will be done by the suppliers personnel.

DIRECT AGREEMENT

Our Agreement to pick up drums is based on direct agreement with the company or party who has emptied the drums. We cannot accept drums from third parties because there is no practical way they can guarantee compliance with all provisions of our Drum Acceptance Policy. Accordingly,
should you elect to ship the drums by means of common carrier or by your truck, freight prepaid, all documents must be in the name of the drum emptier.

PLANT REVIEW

Our Company not only welcomes but encourages a plant review inspection by drum emptiers sending us their drums. The reality of today's strict environmental regulation demands that all producers of secondary materials ensure that these products are handled and disposed of in compliance with all current laws and rules. Please contact us to schedule a plant inspection; we cannot accommodate "drop-in" visits.

PRICES

Prices paid for good, reusable drums and prices charged for replacement bungs, non-economic drums and scrap preparation charges are provided in the attached quotation.

ATTACHMENT 2

Capital Drum
749 Berry Street
Roseville, CA 95678

1. The yard at Capital Drum.

2. A stack of drums in the yard.

Capital Drum
749 Berry Street
Roseville, CA 95678

3. A stack of drums in the the yard.

4. Poly drums in Capital's yard.

Capital Drum
749 Berry Street
Roseville, CA 95678

5. A stack of drums in the yard.

6. A stack of drums in the yard.

Capital Drums
749 Berry Street
Roseville, CA 95678

7. Plastic 5 gallon drums in Capital's yard.

8. Diet coke drums in Capital's yard.

9. Nestle drums in Capital's yard.

10. Used oil accumulation area.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

24 OCT 1988

Val Siebal
Northern California Section
Toxic Substances Control Division
4410 Power Inn Road
Sacramento, CA 95826

Dear Val:

Enclosed are EPA's FY89 CEI inspection checklists for RCRA hazardous waste Treatment/Storage/Disposal facilities, Generators, and Transporters. These checklists are to be used for FY89 inspections beginning December 1, 1988.

Changes in this year's checklists include the addition of the Part 268 "First Third" Land Disposal Restrictions, reformatting of the Generator checklist, expansion of the index pages, and the updating of various portions of all checklists to reflect regulatory changes. The checklists are comprised of discrete stapled sections which are intended to be maintained is this original format. Some sections, such as 265 Subparts C,D,I,J, and Parts 266, 268, and 280 will be used for both generator and TSD inspections.

These checklists will be discussed as part of the Field Staff Information Exchange meeting scheduled for November 1 in your offices. Please have copies distributed to all S&E staff prior to the meeting to facilitate our discussion. If you have any questions, please contact Barry Cofer of my staff at (415) 974-7844.

Sincerely,

Jane E. Diamond

Jane E. Diamond
Chief, Compliance Section

Enclosures

cc: Paul Blais (w/o enclosures)
Caroline Cabias "

TREATMENT/STORAGE/DISPOSAL FACILITIES
CEI Checklist

SITE ID#: __ __ __ __ __ __ __ __ __ __ __ __ __ INSPECTION DATE: _____

SITE NAME: _____

LOCATION: _____

_____ __ __ __ __ __ __ __ __
City State Zip

LEAD INSPECTOR: _____ OFFICE: _____

INDEX FOR T/S/D'S CHECKLIST

LINE OUT ITEMS NOT APPLICABLE TO THIS FACILITY

For inactive facilities (those no longer adding hazardous waste to treatment, storage, or disposa units but which have not certified clean closure in accordance with an approved closure plan) some portions of this checklist may not be applicable. The Inactive Facilities checklist

NOTES:

Facility Representatives:

Other Inspectors:

Documents Copied or Requested:

Areas Present / Inspected:
(Note which are active/inactive)

Facility Recipient of Report:

Mailing Address (if different):

Interim Status:
(Part 270 Subpart G)

	Yes	No	Comments
For the existing HWM facility to be treated as having been issued a permit, has the facility:			
Obtained an EPA Identification number by submitting a Notification of Hazardous Waste Activity?* and/or: 265.11, 270.70(a)(1)	___	___	_____
Submitted a Part A permit application? ** 270.70(a)(2)	___	___	_____
Completed the Part A per 270.13? 270.70(b)	___	___	_____
Not previously been denied a RCRA permit or interim status? 270.70(c)	___	___	_____
Has the facility complied with the following restrictions while operating under interim status: 270.71(a)-			
(1) Has only treated, stored or disposed of H.W. specified in the Part A?	___	___	_____
(2) Has only employed processes specified in the Part A?	___	___	_____
(3) Has not exceeded design capacities specified in the Part A?	___	___	_____
Has a revised Part A been submitted prior to the following changes: 270.72-			
(a) T/S/D of H.W. not previously identified in the Part A?	___	___	_____
(b) Increases in design capacity of processes?	___	___	_____
(c) Changes in or additions to processes?	___	___	_____
(d) 90 days prior to change in ownership?	___	___	_____
(e) Have the changes made not amounted to reconstruction?***	___	___	_____

* Also see Part 266 Subparts D (HW Fuel Burning) and E (Used Oil Burning) if applicable.

** Earliest applicable of: 11/19/80, 6 months after new reg's published, 30 days after they first become subject to reg's. (270.10(e)(i)-(iii)(3))

*** >50% of the cost of an entirely new facility, except for changes made solely for complying with new regulations for tanks (265.193) and/or Land Disposal Restrictions (268).

Interim Status - Cont.
(Part 270 Subpart G)

	Yes	No	Comments
Termination of interim status:			
Did the facility submit a requested Part B in full, and on time? 270.10(e)(5), 270.73(b)	___	___	_____
For land disposal facilities granted interim status prior to 11/8/84, did the facility submit before 11/8/85: 270.73(c)-			
(1) Part B of the permit application?	___	___	_____
(2) Certification of compliance with all applicable ground water monitoring and financial responsibility requirements?	___	___	_____
For land disposal facilities granted interim status after 11/8/84, did the facility submit within 12 months: 270.73(d)-			
(1) Part B of the permit application?			
(2) Certification of compliance with all GW monitoring and financial responsibility requirements?	___	___	_____
For incinerator facilities, did the facility submit a Part B before 11/8/86? 270.73(e)	___	___	_____
For all other facilities, was a Part B submitted before 11/8/88* ? 270.73(f)	___	___	_____

See also applicable interim-status requirements for surface impoundments (265.221(b), p. K1) and landfills (265.301(b), p. N1).

*If no, interim status will terminate on 11/8/92.

General Facility Standards:
(Part 265 Subpart B)

	Yes	No	Comments
Required Notices: -			
Has the RA been notified at least 4 weeks prior to the receipt of H.W. from a foreign source? 265.12(a) (see also Generators, 262 Subpart F.)	___	___	_____
Before transferring ownership or operation, has the facility notified the new owners/operators in writing of the requirements of Parts 265 and 270? 265.12(b)	___	___	_____
General Waste Analysis:			
Has the facility obtained a detailed chemical and physical analysis that contains all information that must be known to properly treat, store or dispose of each H.W.? 265.13(a)(1)	___	___	_____
Does the facility have records documenting the required H.W. analysis, e.g., lab reports, published data, generator supplied data as developed under Part 261? 265.13(a)(2)	___	___	_____
Has the analysis been repeated to ensure that it is accurate and up-to-date? 265.13(a)(3)	___	___	_____
Is the analysis repeated when there is a change in the generating process? (265.13(a)(3)(i)	___	___	_____
For off-site facilities, is the analysis repeated when the H.W. received does not match the H.W. designated on the manifest? 265.13(a)(3)(ii)	___	___	_____
For off-site facilities, does the facility inspect or analyze each movement of H.W. to verify that the H.W. received matches the identity of the H.W. specified on the manifest? 265.13(a)(4)	___	___	_____

General Facility Standards: - Continued
(Part 265 Subpart B)

	Yes	No	Comments
Has the facility developed and followed a written waste analysis plan, and is the plan kept at the facility? 265.13(b)	___	___	_____
Does the waste analysis plan contain the following elements: 265.13(b)-			
(1) Parameters of analysis of each H.W. handled and the rationale for the selection of these parameters?	___	___	_____
(2) The methods which will be used to test for these parameters?	___	___	_____
(3) Sampling method used to obtain a representative sample of each H.W.?	___	___	_____
(4) Frequency which each analysis will be repeated?	___	___	_____
(5) For off-site facilities, the analysis that generators have agreed to supply?	___	___	_____
(6) The methods which will be used to meet the additional analysis requirements for:			
Tanks? (265.198-200)	___	___	_____
Surface Impoundments? (265.225, & p. K2)	___	___	_____
Waste Piles? (265.252)	___	___	_____
Land Treatment? (265.273)	___	___	_____
Liquids in landfills? (265.314)	___	___	_____
Incinerators? (265.341)	___	___	_____
Thermal Treatment? (265.375)	___	___	_____
Other treatment? (265.402)	___	___	_____
Land Disposal Restrictions? (268.7)	___	___	_____
Complete applicable checklist on each unit.			
For off-site facilities, does the plan contain the following elements: 265.13(c)-			
(1) Description of procedures used to identify each movement of H.W.?	___	___	_____
(2) Description of the sampling method used to obtain a representative sample of the H.W.?	___	___	_____

General Facility Standards: - Continued
(Part 265 Subpart B)

	Yes	No	Comments
Unless exempt under 265.14(a)(physical contact or disturbance of the waste and unit will not cause harm), do security measures include:			
A 24-hour surveillance system? 265.14(b)(1) or:	___	___	_____
Artificial or natural barriers that complete enclose the facility? 265.14(b)(2)(i) and:	___	___	_____
Means to control entry onto the active portions of the facility at all times? 265.14(b)(2)(ii)	___	___	_____
Are signs with the legend "Danger-Unauthorized Personnel Keep Out" or equivalent posted that are: 265.14(c)			
At each entrance and any other approach to active portions of facility?	___	___	_____
Legible from at least 25 feet away?	___	___	_____
Written in English and any other language predominant in the surrounding area?	___	___	_____
General Inspection Requirements:			
Does the facility inspect for malfunctions, deterioration, operator errors, and H.W. discharges often enough to correct problems before they cause harm? 265.15(a)	___	___	_____
Does the facility follow a written inspection schedule? 265.15(b)(1)	___	___	_____
Is the schedule kept at this facility? 265.15(b)(2)	___	___	_____
Does the schedule identify types of problems that are expected from malfunction, operator error, deterioration or discharges of all: 265.15(b)(3)			
monitoring equipment?	___	___	_____
safety, emergency equipment?	___	___	_____
security devices?	___	___	_____
operating and structural equipment?	___	___	_____

General Facility Standards: - Continued
(Part 265 Subpart B)

	Yes	No	Comments
Does the schedule include: 265.15(b)(4)			
The frequency of inspection for each item?	___	___	_____
Daily inspections for loading and unloading areas?	___	___	_____
The frequencies required by each H.W. unit?	___	___	_____
Has the facility taken immediate remedial action to correct hazards revealed on an inspection? 265.15(c)	___	___	_____
Are inspections recorded in an inspection log? Does the log include: 265.15(d)	___	___	_____
Date and time of inspection?	___	___	_____
Name of inspector?	___	___	_____
Observations noted?	___	___	_____
Date and nature of repairs or other remedial actions?	___	___	_____
Are inspection records kept for at least 3 years? 265.15(d), 265.73(b)(5)	___	___	_____
Does the facility have a H.W. personnel training program? 265.16(a)(1)	___	___	_____
Is it directed by a person trained in H.W. management procedures? 265.16(a)(2)	___	___	_____
Does the program include training in emergency procedures including contingency plan implementation? 265.16(a)(3)- and:	___	___	_____
(i) Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment?	___	___	_____
(ii) Key parameters for automatic waste feed cut-off systems?	___	___	_____
(iii) Communication or alarm systems?	___	___	_____
(iv) Response to fire or explosions?	___	___	_____
(v) Response to ground-water contamination incidents?	___	___	_____
(vi) Emergency shutdown of operations?	___	___	_____
Are new personnel supervised until training is completed? 265.16(b)	___	___	_____

General Facility Standards: - Continued
(Part 265 Subpart B)

	Yes	No	Comments
Do new personnel complete the training within 6 months? 265.16(b)	___	___	_____
Do personnel take part in an annual review of the initial training? 265.16(c)	___	___	_____
Do personnel training records include for each H.W. position: 265.16(d)-			
(1) Job title and name of person filling the position?	___	___	_____
(2) Job Description?	___	___	_____
(3) Description of required H.W. training?	___	___	_____
(4) Documentation that H.W. training or job experience required has been completed?	___	___	_____
Are training records kept for current employees until closure, and past employees for at least three years? 265.16(e)	___	___	_____
Requirements for ignitable, reactive, or incompatible wastes:			
Are precautions taken to prevent accidental ignition or reaction, including: 265.17(a)			
Separation and protection from ignition sources?	___	___	_____
No smoking signs in hazard areas?	___	___	_____
Is the T/S/D of ignitable, reactive or incompatible waste conducted so that it does not: 265.17(b)-			
(1) Generate extreme heat or pressure, fire or explosion, or violent reaction?	___	___	_____
(2-3) Produce uncontrolled toxic or flammable mists, fumes, dusts or gases?	___	___	_____
(4) Damage structural integrity of H.W. containment devices?	___	___	_____
(5) Otherwise threaten human health or the environment?	___	___	_____

Preparedness and Prevention:
(Part 265 Subpart C)

	Yes	No	Comments
Location Standards:			
Has the facility not placed H.W. in a salt dome, salt bed formation, underground mine or cave? 265.18	___	___	_____
Is the facility maintained and operated to minimize the possibility of fire, explosion, or releases of H.W. or H.W. constituents to air, soil, or surface water which could threaten human health or the environment? 265.31	___	___	_____
Does the facility have the following equipment where applicable: 265.32-			
(a) Internal communications or alarm system capable of providing immediate emergency instruction?	___	___	_____
(b) Telephone or 2-way radios at the scene of operation?	___	___	_____
(c) Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment?	___	___	_____
(d) Water at adequate volume and pressure, or foam producing equipment, or automatic sprinklers, or water spray systems?	___	___	_____
Does the facility test and maintain all emergency equipment in operable condition? 265.33	___	___	_____
Do personnel in areas where H.W. is being handled have immediate access to internal alarm or communications systems, or voice or visual contact with another employee? 265.34(a)	___	___	_____
Can personnel that operate the facility while alone immediately access external emergency assistance? 265.34(b)	___	___	_____
Is there adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency? 265.35	___	___	_____

Preparedness and Prevention: - Continued
(Part 265 Subpart C)

	Yes	No	Comments
Arrangements With Local Authorities:			
Has the facility attempted to make the following arrangements:			
Arrangements to familiarize police, fire dept., and emergency response teams with H.W. operations? 265.37(a)(1)	___	___	_____
Agreements designating primary emergency authority? 265.37(a)(2)	___	___	_____
Agreements with State emergency response teams, contractors and equipment suppliers? 265.37(a)(3)	___	___	_____
Arrangements to familiarize local hospitals with the properties of H.W. and the types of potential injuries and illnesses from exposure to H.W.? 265.37(a)(4)	___	___	_____
Did the facility document in the operating record any refusal by State or local authorities to enter into such arrangements? 265.37(b)	___	___	_____

Contingency Plan and Emergency Procedures:
(Part 265 Subpart D)

	Yes	No	Comments
Does the facility have a contingency plan designed to minimize hazards from fires, explosions, or any unplanned releases of H.W. or H.W. constituents? 265.51(a)	___	___	_____
Does the plan describe actions personnel must take to comply with 265.51 and 265.56 responses? 265.52(a)	___	___	_____
Does the plan describe the arrangements agreed to in 265.37? 265.52(c)	___	___	_____
Does the Plan list the current names, addresses, and phone numbers (office & home) of all persons qualified to act as emergency coordinators? 265.52(d)	___	___	_____
Does the plan name one person as primary emergency coordinator and list any others in order of responsibility? 265.52(d)	___	___	_____
Does the plan list all emergency equipment including the location and physical description of each item on the list and a brief outline of its capability? 265.52(e)	___	___	_____
Does the plan include an evacuation plan for personnel and a description of signals to begin evacuation, evacuation routes and alternate routes? 265.52(f)	___	___	_____
Is the plan maintained at the facility? 265.53(a)	___	___	_____
Has the plan been submitted to all local emergency organizations that may be called upon in responses? 265.53(b)	___	___	_____
Has the plan been reviewed and immediately amended whenever: 265.54-			
(a) Applicable regulations are revised?	___	___	_____
(b) The plan fails in an emergency?	___	___	_____
(c) Facility changes required it?	___	___	_____

Contingency Plan and Emergency Procedures: - Con't.
(Part 265 Subpart D)

	Yes	No	Comments
(d) The list of emergency coordinators changes?	___	___	_____
(e) The list of emergency equipment changes?	___	___	_____
Is there at all times at least one employee at the facility, or close by and on call, designated as emergency coordinator? 265.55	___	___	_____
Is this coordinator thoroughly familiar with all aspects of site operations, including locations and characteristics of waste handled, the locations of records, the facility layout, and emergency procedures? 265.55	___	___	_____
Does the coordinator have authority to commit the resources to carry out the contingency plan? 265.55	___	___	_____
If an emergency situation has occurred at this facility, did the emergency coordinator immediately:			
Activate alarm systems? 265.56(a)(1)	___	___	_____
Notify the appropriate response agencies? 265.56(a)(2)	___	___	_____
Identify the character, exact source and amount, and real extent of any released materials? 265.56(b)	___	___	_____
Assess the possible direct and indirect hazards from the release, including gases and run-off of fire fighting materials? 265.56(c)	___	___	_____
If assessment indicates the release could threaten harm outside the facility, does the E.C.:			
Report his findings to appropriate authorities if it may be advisable to evacuate the local area, and remain on call to help the authorities decide? 265.56(d)(1)	___	___	_____

Contingency Plan and Emergency Procedures: - Con't.
(Part 265 Subpart D)

	Yes	No	Comments
Immediately notify either the government on-scene coordinator or the National Response Center' toll-free line at 800/424-8802? 265.56(d)(2)	___	___	_____
Did the report include: 265.56(d)(2)-			
(i) The name and phone # of the reporter?	___	___	_____
(ii) Name and address of the facility?	___	___	_____
(iii) Time and type of incident?	___	___	_____
(iv) Name and quantity of materials involved to the extent known?	___	___	_____
(v) The extent of any injuries?	___	___	_____
(vi) The possible hazards to the outside area?	___	___	_____
During the emergency, does the E.C. take all reasonable measures to minimize the release? 265.56(e)	___	___	_____
If the facility had to stop operations to respond, does the E.C. monitor all appropriate equipment? 265.56(f)	___	___	_____
After the emergency, does the E.C. immediately provide for the TSD of recovered or contaminated material resulting from the release? 265.56(g)	___	___	_____
Does the E.C. ensure that, in the affected areas of facility: 265.56(h)			
(1) Wastes incompatible with the released material are not handled until after clean-up is complete?	___	___	_____
(2) All emergency equipment is clean and fit for use before operations resume?	___	___	_____
Does the facility notify the R.A., State and local authorities that the above has been done before resuming operations in affected areas? 265.56(i)	___	___	_____

Contingency Plan and Emergency Procedures: - Con't.
(Part 265 Subpart D)

	Yes	No	Comments
If the contingency plan has been implemented:			
Did the operating record include the date, time, and any details of each incident that required implementation of the contingency plan? 265.56(j)	___	___	_____
Within 15 days after the incident, did the facility submit a written report to the Regional Administrator? 265.56(j) and 265.77(a)	___	___	_____
Did the report include: 265.56(j)-			
(1) Name, address and phone # of the owner or operator?	___	___	_____
(2) Name, address, and phone # of the facility?	___	___	_____
(3) Date, time, and type of incident?	___	___	_____
(4) Name and quantity of materials involved?	___	___	_____
(5) The extent of any injuries?	___	___	_____
(6) A hazard assessment?	___	___	_____
(7) An estimate of the quantity and disposition of recovered material?	___	___	_____

Manifest System, Recordkeeping, and Reporting:
(Part 265 Subpart E)

	Yes	No	Comments
Manifest system:			
If the facility receives H.W. from an off-site source, do they comply with the following manifest requirements:			
Sign and date each copy of the manifest? 265.71(a)(1)	___	___	_____
Note any significant * discrepancies in the manifest? 265.71(a)(2)	___	___	_____
Give transporter one copy of the signed manifest? 265.71(a)(3)	___	___	_____
Within 30 days after delivery, send a copy of the manifest to the generator? 265.71(a)(4)	___	___	_____
Are records of past shipments retained for 3 years? 265.71(a)(5)	___	___	_____
Manifest Discrepancies:			
Upon discovering a significant discrepancy, has the facility made an attempt to reconcile the discrepancy with the generator or transporter? 265.72(b)	___	___	_____
For discrepancies not reconciled within 15 days, has the facility followed the required reporting procedures? 265.72(b)	___	___	_____
Unmanifested Waste Report:			
For a facility that has accepted a H.W. from an off-site source without an accompanying manifest, and the generator was not a conditionally exempt small quantity generator (261.5), was a report containing the required information submitted to the RA within 15 days after receiving the H.W.? 265.76(a-g)	___	___	_____

Note: For TSDs that generate H.W. complete Part 262 checklist p. 6, Manifests and p. 9, Recordkeeping and Reporting.

* Significant discrepancies are:

1. For bulk waste; variations > 10% in weight
2. For containerized waste; variations > one drum
3. Obvious differences such as waste solvent substituted for waste acid, or toxic constituents not reported on the manifest.

Manifest System, Recordkeeping, and Reporting: - Con't
(Part 265 Subpart E)

	Yes	No	Comments
Operating Record:			
Does the facility maintain an operating record? 265.73(a)	___	___	_____
Does the operating record contain the following information:			
A description and the quantity of each waste received as required by Appendix I? 265.73(b)(1)	___	___	_____
The method(s) and date(s) of its treatment, storage or disposal as required by Appendix I? 265.73(b)(1)	___	___	_____
The location of each waste within the facility and the quantity at each location? 265.73(b)(2)	___	___	_____
For disposal facilities, the location and quantity of each waste recorded on a map or diagram of each cell or disposal area? 265.73(b)(2)	___	___	_____
For all facilities, is the location and quantity information cross-referenced to specific manifest numbers? 265.73(b)(2)	___	___	_____
Records and results of all waste analysis and trial tests? 265.73(b)(3)	___	___	_____
Reports detailing all incidents that required implementation of the contingency plan? 265.73(b)(4)	___	___	_____
Records and results of inspections for the last three years? 265.73(b)(5)	___	___	_____
Monitoring, testing, and analytical data? 265.73(b)(6)	___	___	_____
All closure and post-closure costs as applicable? 265.73(b)(7)	___	___	_____
Records of the quantities (and date of placement) for each shipment of hazardous waste placed in land disposal units when granted a Part 268 case-by-case extension, monitoring data required by a successful petition, certifications under 268.8 (1st 3rd soft hammer), and all applicable generator notices? 265.73(b)(8)	___	___	_____

Manifest System, Recordkeeping, and Reporting: - Con't.,
(Part 265 Subpart E)

	Yes	No	Comments
Is a copy of each notice, and any applicable certification and demonstration, required of the generator under Part 268 retained for each shipment of wastes received from off-site for: 265.73(b)-			
(9) Treatment?	___	___	_____
(11) Disposal?	___	___	_____
(13) Storage?	___	___	_____
Is all information required of a generator under Part 268 including notices (except for the manifest number), and any applicable certification and demonstration, on file where the facility is further handling restricted wastes generated on-site by: 265.73(b)-			
(10) Treating?	___	___	_____
(12) Disposing?	___	___	_____
(14) Storing?	___	___	_____
Availability, Retention, Disposition of Records:			
Are all records, including plans, available for inspection? 265.74(a)	___	___	_____

Manifest System, Recordkeeping, and Reporting: - Con't.
(Part 265 Subpart E)

	Yes	No	Comments
Biennial Report:			
Has the facility submitted a biennial report to the RA by March 1 of each even numbered year? 265.75	___	___	_____
Was the report submitted on EPA form 8700-13B and did it cover facility activities during the previous calendar year? 265.75	___	___	_____
Does the report include the following information: 265.75-			
(a) EPA identification number, name and address of the facility?	___	___	_____
(b) Calendar year covered by report?	___	___	_____
(c) For off-site facilities, the EPA ID number of each HW generator?	___	___	_____
(d) A description and quantity of each H.W. received and, for off-site facilities, the EPA identification number of each generator listed with this information?	___	___	_____
(e) Methods of treatment, storage, or disposal for each H.W.?	___	___	_____
(f) Ground-water monitoring data under 265.94(a)(2)(ii-iii) and (b)(2)?	___	___	_____
(g) Most recent closure and post-closure cost estimates?	___	___	_____
(h) Signed certification?	___	___	_____

Ground-Water Monitoring:
(Part 265 Subpart F)

	Yes	No	Comments
If the facility operates a HW surface impoundment, landfill, or land treatment unit*, has a ground-water monitoring program consisting of at least one up-gradient and three down-gradient wells been implemented (and certified under 270.73)? 265.90(a)	___	___	_____
If no, is a written waiver demonstration, certified by a qualified geologist or geotechnical engineer, kept at the site? 265.90(c)	___	___	_____
Date of last CME or O&M: ___/___/___			EPA?___ State?___
Is a ground-water sampling and analysis plan kept at the facility? 265.92(a)	___	___	_____
Does it include procedures and techniques for: 265.92(a)-			
(1) Sample collection?	___	___	_____
(2) Sample preservation and shipment?	___	___	_____
(3) Analytical procedures?	___	___	_____
(4) Chain of custody control?	___	___	_____
Has an outline of a ground-water quality assessment program been prepared? 265.93(a)	___	___	_____
Have records been kept of: 265.94(a)(1)			
Analysis for all parameters (see next page) quarterly for the first year as required by 265.92(c)?	___	___	_____
Ground-water quality analysis annually since the first year as required by 265.92(d)(1)?	___	___	_____
Ground-water contamination indicators at least semi-annually since the first year as required by 265.92(d)(2)?	___	___	_____
Ground-water surface elevations taken during each sampling of each well as required by 265.92(e)?	___	___	_____
The Student's t-test calculations (at the 0.01 level of significance) for comparison of ground-water contamination indicators over initial background as required in 265.93(b)?	___	___	_____

* Including units that are inactive but not certified as clean closed.

	Yes	No	Comments
If the facility found comparisons for downgradient wells made under 265.93(b) showed a significant increase (or pH decrease) over background levels, proceed to page F3.			
Have the following been submitted to the RA: 265.77(b), 265.94(a)(2)			
During the first year, the initial background concentrations of parameters listed in 265.92(b) within 15 days after completing each quarterly analysis? 265.94(a)(2)(i)	___	___	_____
For each well, were any parameters whose concentrations or values exceeded the maximum contaminant levels allowed in drinking water supplies (Appendix III) separately identified? 265.94(a)(2)(i)	___	___	_____
Annual reports by each March 1 including:			
Concentrations or values of parameters used as indicators of ground-water contamination for each well along with required evaluations under 265.93(b)? 265.94(2)(ii)	___	___	_____
Separate identification of any significant differences from initial background found in the upgradient wells? 265.94(2)(ii)			
Results of the previous year's evaluation of ground-water elevations, and a description of any applicable response? 265.94(2)(iii)	___	___	_____

EPA interim primary drinking water standards (265.92(b)(1)):
Arsenic, Barium, Cadmium, Chromium, Fluoride, Lead, Mercury, Nitrate (as N), Selenium, Silver, Endrin, Lindane, Methoxychlor, Toxaphene, 2-4 D, 2,4,5-TP Silver, Radium, Gross Alpha, Gross Beta, Turbidity (surface water), Coliform Bacteria.

Parameters establishing ground-water quality (265.92(b)(2)):
Chloride, Iron, Manganese, Phenols, Sodium, Sulfate.

Parameters used as indicators of ground-water contamination (265.92(b)(3)):
pH, Specific Conductance, Total Organic Carbon, Total Organic Halogen.

Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

	Yes	No	Comments
Reporting by facilities that may be affecting ground-water quality: 265.77(b), 265.93(d)			
If the facility confirmed the determination they may be affecting ground-water quality was not made in error (265.93(c)(2)), was a written notice sent to the RA within 7 days of confirmation? 265.93(d)(1)	___	___	_____
Within 15 days of notification to the RA was a certified ground-water quality assessment plan submitted? 265.93(d)(2)	___	___	_____
After implementation of this plan, did the facility determine if H.W. or H.W. constituents from the facility have entered the ground-water? 265.93(d)(4)	___	___	_____
Within 15 days after the determination was a written report containing the assessment of ground-water quality submitted to the RA? 265.93(d)(5)	___	___	_____
If no H.W. or H.W. constituents were shown to have entered the ground water, was the RA informed in the determination if the indicator evaluation program only (defined in 265.92 and 265.93(b)) was reinstated? 265.93(d)(6)	___	___	_____
If H.W. or H.W. constituents have been determined to have entered the ground water, are determinations of H.W or H.W. constituents continued on a quarterly basis until final closure of the facility*? 265.93(d)(7)	___	___	_____

* If the program was implemented during the post-closure care period, determinations made in accordance with the ground-water quality assessment plan may cease after the first determination per 265.93(d)(7)(ii).)

Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

	Yes	No	Comments
Were records kept of the analysis and evaluations specified in the ground-water quality assessment throughout the life of the facility? 256.94(b)(1)	___	___	_____
If a disposal facility, were (are) records kept throughout the post-closure period as well? 265.94(b)(1)	___	___	_____
Are annual reports submitted by March 1 to the RA containing the results of the ground-water quality assessment program? 265.94(b)(2)	___	___	_____
Do the reports include the calculated or measured rate of migration of H.W. or H.W. constituents during the reporting period? 265.94(b)(2)	___	___	_____

Closure and Post-Closure:
(Part 265 Subpart G)

	Yes	No	Comments
Does the facility have a closure plan? 265.112(a)	___	___	Date: _____
If the plan has not been approved by the EPA, was a copy available on the day of inspection? 265.112(a)	___	___	_____
Does the plan identify for the active life of the facility:			
The steps necessary to completely or partially close the facility at any point? 265.112(b)	___	___	_____
How each Hazardous Waste management unit will be closed? 265.112(b)(1)	___	___	_____
How final closure standards (265.111) will be met? 265.112(b)(2)	___	___	_____
The maximum extent of the operation which will be unclosed? 265.112(b)(2)	___	___	_____
An estimate of the maximum inventory of HW ever on-site? 265.112(b)(3)	___	___	_____
A detailed description of the methods to be used during partial and final closure? including: 265.112(b)(3)	___	___	_____
Removing, transporting, treating, storing, and disposal of all HW?	___	___	_____
Identification of and types of off-site HW management units to be used?	___	___	_____
A detailed description of steps for removal or decontamination during partial and final closure? including: 265.112(b)(4)	___	___	_____
Contaminated containment system components, equipment, containers, structures, soils, and HW residues?	___	___	_____
Procedures for cleaning equipment and removing contaminated soils?	___	___	_____
Methods for sampling and testing surrounding soils?	___	___	_____
Testing criteria for determining adequacy of clean-up?	___	___	_____

Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	Yes	No	Comments
A detailed description of all other activities neccessary during partial and final closure to satisfy the closure performance standards, including: 265.112(b)(5)	___	___	_____
Ground-water monitoring?	___	___	_____
Leachate collection?	___	___	_____
Run-on and run-off control?	___	___	_____
A schedule for closure of each HW unit and for final closure of the facility? Does the schedule include: 265.112(b)(6)	___	___	_____
Total time required to close each unit?	___	___	_____
Time required for each intervening closure activity?	___	___	_____
An estimate of the expected year of final closure, if the closure plan has not been approved*? 265.112(b)(7)	___	___	_____
Has the facility amended the plan whenever affected by changes in: 265.112(c)(1)-			
(i) Operating plans or facility design?	___	___	_____
(ii) Expected year of closure?	___	___	_____
(iii) Problems encountered during partial or final closure?	___	___	_____
Was the amendment made at least 60 days prior to any proposed facility changes, and within 60 days (30 days if already in a closure period) of unexpected changes? 265.112(c)(2)	___	___	_____
If the plan has already been approved, was the amended plan resubmitted to the RA by this deadline? 265.112(c)(3)	___	___	_____

* Also applies to facilities that have use trust funds to demonstrate financial assurance and expect to close within the next twenty years.

Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	Yes	No	Comments
Does the schedule for closure allow for the following:			
Treatment, removal, or disposal of H.W. within 90 days after receipt of final volume of H.W. or after approval of closure plan? 265.113(a)	___	___	_____
Completion of closure plan activities within 180 days after receipt of final volume of H.W. or after approval of closure plan? 265.113(b)	___	___	_____

If any closure activities have commenced, see page G5.

Closure and Post-Closure: - Continued
(Part 265 Subpart G)

Post-closure plan:	Yes	No	Comments
If the facility operates a hazardous waste disposal unit, do they have a post-closure plan? 265.118(a)	___	___	_____
If the plan has not been approved by the EPA, was a copy available on the day of inspection? 265.118(b)	___	___	_____
If the facility was intending to clean-close a surface impoundment or waste pile and found they are required to close it as a landfill, did they submit a post-closure plan to the RA within 90 days? 265.118(a),(d)(3-4)	___	___	_____
Does the plan provide for 30 years of post-closure care (unless granted an exemption under 265.118(g))? 265.117(a)(1)	___	___	_____
Does the plan describe the monitoring activities and the frequency they will be performed to comply with each unit's regulatory requirements? 265.118(c)(1)	___	___	_____
Does the plan describe the maintenance activities and the frequency they will be performed to ensure: 265.118(c)(2)-			
(i) The integrity of the cap, final cover or other containment devices?	___	___	_____
(ii) The continued function of the monitoring devices?	___	___	_____
Does the plan identify the name, address and phone number of the post-closure period contact? 265.118(c)(3)	___	___	_____
Did the facility amend the plan whenever changes in operating plans, facility design, or events which occur during the active life of the facility affect their post-closure plan? 265.118(d)(1)	___	___	_____
Was the amendment made at least 60 days prior to any proposed facility changes, and within 60 days of any unexpected changes? 265.118(d)(2)	___	___	_____
Was the amended plan resubmitted to the RA by this deadline? 265.118(d)(3)	___	___	_____

	Yes	No	Comments
Closure Activities:			
Deadlines for submission of post-, partial-, and final closure plans:			
If the plans had not been approved, had the facility submitted the plan at least 180 days prior to the expected closure of the first surface impoundment, waste pile, landfill, or land treatment unit? 265.112(d), -118(e)	___	___	_____
Had a closure plan been submitted 45 days prior to the expected closure of a facility with only tanks, container storage, or incinerator units? 265.112(d)	___	___	_____
If the closure plan had already been approved, was it resubmitted 60 days prior to the expected closure of any surface impoundment, waste pile, landfill, or land treatment unit? 265.112(d)	___	___	_____
Was the "expected closure" date within:			
30 days after a H.W. unit received its known final volume of HW? 265.112(d)(2), -.118(e) or:	___	___	_____
If there was a reasonabe possibility the H.W. unit would receive additional waste, one year since it actually last received a volume of H.W. (unless granted an exemption)? 265.112(d)(2), -.118(e)	___	___	_____
Was the closure plan submitten within 15 days after termination of interim status for any reason other than being granted a final permit? 265.112(d)(3), -.118(e)(1)	___	___	_____
Facilities in the process of closure:			
Was all H.W. in the closing unit or facility treated, removed, or disposed of on-site, in accordance with the approved closure plan, within 90 days after receiving either the final volume of H.W or approval of the closure plan? 262.113(a) or:	___	___	_____
Did the RA approve a longer period? 262.113(a)(1-2)	___	___	_____

Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	Yes	No	Comments
Facilities that have completed closure activities:			
Did the facility complete partial and final closure activities within 180 days after either receiving the final volume of HW or approval of the closure plan; or were they granted an exemption? 265.113(b)	___	___	_____
Have all equipment and structures been properly disposed of or decontaminated by removing all H.W. and contaminated residues? 265.114	___	___	_____
Certification of closure:			
Within 60 days of completion of closure of each surface impoundment, waste pile, land treatment, landfill unit, or final facility closure, has a certification by the owner/operator and an independent registered professional engineer been submitted to the RA? 265.77(c), 265.115	___	___	_____
No later than the submission of the closure certification for each disposal unit, was a survey plat submitted to the RA and local land authority? 265.116	___	___	_____
Was the survey plat prepared and certified by a professional land surveyor?	___	___	_____
Did it indicate the locations and dimensions of landfill cells or other disposal areas with respect to permanently surveyed benchmarks?	___	___	_____
Did it contain a note, prominently displayed, which states the owner's or operator's obligation to restrict disturbance of the HW disposal unit?	___	___	_____
Post-closure notices:			
Has the owner/operator submitted to the RA and the local land authority within 60 days of the certification of closure of each H.W. unit a record of the type, location, and quantity of HW disposed of within each disposal unit since January 12, 1981? 265.74(c), 265.119(a)	___	___	_____

Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	Yes	No	Comments
Within 60 days of certification of closure for the first H.W. disposal unit, and within 60 days of certification of the last H.W. disposal unit, has the owner/ operator: 265.119(b)-			
(1) Placed a record in the deed that will in perpetuity notify any potential purchaser of the property that:			
(i) The land was used to manage H.W.?	___	___	_____
(ii) Its use is restricted under Subpart G?	___	___	_____
(iii) The required survey plat (265.116) and disposal records (265.119(a)) have been filed?	___	___	_____
(2) Submitted to the RA a signed, certified copy of the notice and deed?	___	___	_____
Post-closure care:			
Has the specified post-closure contact kept the plan during the post-closure care period? 265.118(b)	___	___	_____
Are all post-closure care activities in the approved plan being performed? 265.117(d)	___	___	_____
Has the owner or operator, or any subsequent owner of the land, obtained an approved post-closure plan modification before tampering with the HW unit? 265.119(c)	___	___	_____
Completion of post-closure care:			
At the completion of post-closure care for each unit, did the facility certify to the RA within 60 days that the care was performed in accordance to the post-closure plan's specfications? 265.120	___	___	_____
Was the certification signed by an independent registered professional engineer? 265.120	___	___	_____

Financial Requirements:
(Part 265 Subpart H)

	Yes	No	Comments
Is the facility owned by the State or Federal Government? 265.140(c) If Yes, Subpart H is not applicable.	___	___	_____
Cost estimate for closure:			
Has a written estimate been prepared of the cost of closing the facility? 265.142(a)	___	___	_____
What is the amount of the closure cost estimate? $_____			
Does the cost estimate cover all the activities in the closure plan? 265.142(a)-	___	___	_____
(1) Does the estimate equal the cost of closure at the point when the extent and manner of the operation would make closure the most expensive?	___	___	_____
(2) Is the estimate based on the costs of hiring a third party (not a subsidiary or parent corporation) to close the facility?	___	___	_____
(3) Has the estimate not incorporated any salvage values?	___	___	_____
(4) Where the H.W. might have some economic value, was its cost greater than zero?	___	___	_____
Has the cost estimate been adjusted annually and within the required time frames? 265.142(b)	___	___	_____
If the closure cost adjustment was not made by recalculating the cost in current dollars, was the adjustment made by using an inflation factor*? 265.142(b)	___	___	_____

*derived from the Annual Implicit Price Deflator for Gross National Product as published by the U.S. Dept. of Commerce in its "Survey of Current Business"

Latest Annual Deflator = _____ Previous Annual Deflator = _____.
Inflation Factor = _____ (latest deflator/previous deflator)

Current Cost Adjustment = $_____ (latest adjusted estimate x inflation factor)

Financial Requirements: - Continued
(Part 265 Subpart H)

	Yes	No	Comments
Was the cost estimate revised no later than 30 days after a change in the closure plan increased the cost of closure? 265.142(c) (Revised estimate must be adjusted for inflation.)	___	___	_____
Are the latest closure cost estimate and adjusted closure cost estimate kept at the facility during its operating life? 265.142(d)	___	___	_____
Financial assurance for closure:			
Can the facility indicate they have established and submitted at least one of the following financial assurance mechanisms for closure cost: 265.143-			
(a) Closure trust fund?	___	___	_____
(b) Surety bond guaranteeing payments into a closure trust fund?	___	___	_____
(c) Closure letter of credit?	___	___	_____
(d) Closure insurance?	___	___	_____
(e) Financial test and corporate guarantee for closure?	___	___	_____
(The facility may use more than one of the above (265.143(f)), and can be included with another facility (265.143(g)).			
Were the financial assurance mechanisms amended as needed to cover the latest revised closure cost estimate? 265.143	___	___	_____

Financial Requirements: - Continued
(Part 265 Subpart H)

	Yes	No	Comments
Cost estimate for post-closure:			
Has a written estimate been prepared of the cost of post-closure care? 265.144(a)	___	___	_____
What is the amount of the post-closure cost estimate? $ _____			
Was the estimate calculated by multiplying a detailed estimate of annual costs by 30 years of post-closure care? 265.144(a)(2)	___	___	_____
Does the annual care cost estimate cover all the activities in the post-closure plan? 265.144(a)	___	___	_____
Is the estimate based on the costs of hiring a third party (not a subsidiary or parent corporation) to close the facility? 265.144(a)(1)	___	___	_____
Has the post-closure cost estimate been adjusted annually? 265.144(b)	___	___	_____
If the closure cost adjustment was not made by recalculating the cost in current dollars, was the adjustment made by using an inflation factor? 265.144(b)(1-2)	___	___	_____
During the active life of the facility, was the cost estimate revised no later than 30 days after a revision to the post-closure plan increases the cost of post-closure care? 265.144(c) (Revised estimate must be adjusted for inflation.)	___	___	_____
Are the latest post-closure cost estimate and adjusted cost estimate kept at the facility during its operating life? 265.144(d)	___	___	_____

Financial Requirements: - Continued
(Part 265 Subpart H)

	Yes	No	Comments
Financial assurance for post-closure:			
Can the facility indicate they have established and submitted at least one of the following financial assurance mechanisms for post-closure care: 265.145-			
(a) Post-closure trust fund?	___	___	_____
(b) Surety bond guaranteeing payment into a post-closure trust fund?	___	___	_____
(c) Post-closure letter of credit?	___	___	_____
(d) Post-closure insurance?	___	___	_____
(e) Financial test and corporate guarantee for post-closure care?	___	___	_____
(The facility may use more than one of the above (265.145(f)), and can be included with another facility (265.145(g)).			
Were the financial assurance mechanisms amended as needed to cover the latest revised post-closure cost estimate? 265.145	___	___	_____
If the facility chose to satisfy the requirements for financial assurance for both closure and post-closure care by using a single mechanism, did the sum of funds available at least equal what the total would be for separate mechanisms? 265.146	___	___	_____

Financial Requirements: - Continued
(Part 265 Subpart H)

	Yes	No	Comments
Screening for liability requirements:			
Has the facility submitted a demonstration of liability coverage for sudden accidental occurances? 265.147(a)	___	___	_____
Did the sudden accident coverage consist of at least $1 million per occurance and $2 million per year? 265.147(a)	___	___	_____
Was the sudden accident coverage demonstrated by having: 265.147(a)-			
(1) Liability insurance?	___	___	_____
(2) Financial test or corporate guarantee?	___	___	_____
(3) Surety bond for liability?	___	___	_____
(4) Trust fund for liability?	___	___	_____
(5) A combination of the above?	___	___	_____
If demonstrated by having liability insurance, was one or both of the following attached: 265.147(a)(1)(i)*			
Hazardous Waste Facility Liability Endorsement?	___	___	_____
Certificate of Liability Insurance?	___	___	_____
If the facility operates a HW surface impoundment, landfill, or land treatment facility, have they also submitted a demonstration of liability coverage for nonsudden accidental occurances? 265.147(b)	___	___	_____
Did the nonsudden accidental coverage consist of at least $3 million per occurance and $6 million per year? 265.147(b)	___	___	_____
Was the nonsudden accident coverage demonstrated by having: 265.147(b)-			
(1) Liability insurance?	___	___	_____
(2) Financial test or corporate guarantee?	___	___	_____
(3) Letter of credit for liability?	___	___	_____
(4) Surety bond for liability?	___	___	_____
(5) Trust fund for liability?	___	___	_____
(6) A combination of the above?	___	___	_____

*In CA: DHS 8108: Liability Endorsement. DHS 8107: Liability Certificate of Insurance

Financial Requirements: - Continued
(Part 265 Subpart H)

	Yes	No	Comments
If demonstrated by having liability insurance, was one or both of the following attached: 265.147(b)(1)(i) *			
Hazardous Waste Facility Liability Endorsement?	___	___	_____
Certificate of Liability Insurance?	___	___	_____
If the TSD liability coverage amounts were less than those required, has the facility obtained a variance? 265.147(c)	___	___	_____
If the owner or operator has been named the debtor in a proceeding under Title 11 (Bankruptcy), U.S. Code, did they notify EPA within 10 days of the commencement of the proceedings? 265.148	___	___	_____
If the guarantor or financial institution is incapacitated, has the facility owner or operator established other financial assurance or liability coverage within 60 days? 265.148(b)	___	___	_____

*In CA: DHS 8108: Liability Endorsement. DHS 8107: Liability Certificate of Insurance

Use And Management Of Containers:
(Part 265 Subpart I)

	Yes	No	Comments
Does the facility transfer H.W. from containers not in good condition or leaking to containers in good condition? 265.171	___	___	_____
Are containers compatible with the H.W. stored in them? 265.172	___	___	_____
Are containers stored closed? 265.173(a)	___	___	_____
Are containers managed to prevent rupture or leakage? 265.173(b)	___	___	_____
Are containers inspected weekly for leaks and deterioration? 265.174	___	___	_____
Are ignitable or reactive wastes stored at least 50 feet from the facility's property line? 265.176	___	___	_____
Are incompatible wastes stored in separate containers? 265.177(a)	___	___	_____
Is H.W. not placed in unwashed containers that previously held an incompatible waste or material? 265.177(b)	___	___	_____
Are containers holding H.W. that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device? 265.177(c)	___	___	_____
Are containers or inner liners that are not empty managed as H.W.? 261.7(a)(2)	___	___	_____
For a container to be considered empty the facility must ensure that no more remains than: 261.7(b)(1)-			
(i) Can be removed by conventional means (e.g., pouring, pumping, etc.)? and:	___	___	_____
(ii) One inch of residue on bottom of container or inner lining? or:	___	___	_____

* TSDs that generate H.W. also must comply with 262 reg.s. An Accumulation Areas checklist is attached for field use at multiple-unit facilities.

Use And Management Of Containers: Cont.
(Part 265 Subpart I)

	Yes	No	Comments
(empty containers, cont.)			
(iii)(A) If the container is not over 110 gallons in size, 3% of weight when full? or:	___	___	_____
(iii)(B) If the container holds over 110 gallons, no more than 0.3% of weight when full? or:	___	___	_____
If holding compressed gas, is the container at atmospheric pressure? 261.7(b)(2)	___	___	_____
If a container (or liner removed from the container) has held an acute H.W., it is empty if: 261.7(b)(3)-			
(i) It has been triple rinsed using a solvent capable of removing the contents?	___	___	_____
(ii) Cleaned by another proven removal means? or:	___	___	_____
(iii) For the container, the liner prevented contact and has since been removed?	___	___	_____

See also 265.31 (p. C1).

ACCUMULATION AREAS & CONTAINERS

	Names of accumulation areas		
Accumulation if Less than 55 gallons			
The generator may accumulate at or near the point of initial generation up to 55 gals of H.W., or one quart of acutely hazardous waste, provided:			
The containers are marked either with the words "Hazardous Waste" or labels that identify the contents? 262.34(c)(1)(ii)			
AND			
The containers are in good condition 265.171.			
AND			
The containers are compatible with the waste 265.172.			
AND			
The containers are stored closed 265.173(a).			
AND			
The containers must not be opened, handled or stored in a manner which may rupture the container or cause it to leak 265.173(b).			
Accumulation if greater than 55 gallons			
Are containers visibly marked with:			
The date that the waste accumulation started? 262.34(a)(2)			
The words "hazardous waste"? 262.34(a)(3)			
If the generator does not have interim status (as a TSD storage facility), have they accumulated H.W. on-site for less than 90 days? 262.34(a).			

	Names of accumulation areas		
Does the generator comply with the requirements of 40 CFR Part 265: Subpart I for the use and management of containers listed below. 262.34(a)(1)			
Does the facility transfer H.W. from containers not in good condition or leaking to containers in good condition? 265.171.			
Are containers compatible with the H.W. stored in them? 265.172.			
Are containers stored closed? 265.173(a).			
Are containers managed to prevent rupture or leakage? 265.173(b).			
Are containers inspected weekly for leaks and deterioration? 265.174.			
Are ignitable or reactive wastes stored at least 50 feet from the facility's property line? 265.176.			
Are incompatible wastes stored in separate containers? 265.177(a).			
Is H.W. not placed in unwashed containers that previously held an incompatible waste or material? 265.177(b).			
Are containers holding H.W. that is incompatible with any waste or materials stored nearby in other containers, separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device? 265.177(c).			
Does the generator comply with the requirements with 40 CFR Part 265.37: arrangements with local authorities?	See Main checklist		
Does the generator comply with the requirments of 40 CFR Part 265: Subpart D for contingency plan and emergency procedures?	See Main checklist		
Does the generator comply with the requirements of 40 CFR Part 265.16 for personnel training in emergency procedures?	See Main checklist		

	Names of accumulation areas		
Does the generator comply with the requirements of 40 CFR Part 265: Subpart C for Preparedness and Prevention listed below.			
Does the facility have the following equipment where applicable: 265.32-			
(a) Internal communications or alarm system capable of providing immediate emergency instruction?			
(b) Telephone or 2-way radios at the scene of operation?			
(c) Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment?			
(d) Water at adequate volume and pressure, or foam producing equipment, or automatic sprinklers, or water spray systems?			
Are the systems and equipment listed above tested? 265.33.			
Do all personnel have immediate access to the systems and equipment listed in 265.32 (a)-(d)?			
Is there adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency? 265.35.			

Tanks:
(Part 265 Subpart J)

	Yes	No	Comments
Are tanks used to store or treat H.W. exempt from this subpart because they contain no free liquids and are situated inside a building with an impermeable floor? 265.190(a)	___	___	_____
Are tanks exempt from this subpart because they serve only as part of a secondary containment system? 265.190(b)	___	___	_____

See also Part 280, underground product tanks.
If a 100-1000 kg/mo. generator, see Part 262 checklist.

Is H.W. or treatment reagents placed in tanks so that they do not cause the tank, its ancillary equipment, or the secondary containment system to rupture, leak, corrode, or otherwise fail? 265.194(a)	___	___	_____
Are controls and practices used to prevent spillage, including: 265.194(b)-			
(1) Spill prevention controls e.g., check valves, dry discount couplings?	___	___	_____
(2) Overfill prevention devices e.g., level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank?	___	___	_____
(3) Sufficient freeboard in uncovered tanks to prevent overtopping by wind action, wave, or precipitation?	___	___	_____
Are daily inspections done for the following: 265.195(a)-			
(1) Discharge control equipment e.g., feed cutoff, bypass and drainage systems?	___	___	_____
(2) Corrosion or releases of waste in aboveground portions?	___	___	_____
(3) Data gathered from monitoring and leak detection equipment e.g., pressure and temperature gauges, monitoring wells?	___	___	_____

Note: If the primary purpose of this inspection is to evaluate compliance with H.W. storage tank reg's, complete checklists in OSWER guidance of 7/17/87.

	Yes	No	Comments
(4) Construction materials and area surrounding the tank, including secondary containment (e.g., dikes) for erosion or signs of releases (e.g., wet spots, dead vegetation)?	___	___	_____
Are sources of impressed current inspected at least every other month? 265.195(b)(2)	___	___	_____
Are cathodic protection systems inspected six months after initial installation and then annually? 265.195(b)(1)	___	___	_____
If a leak has occurred in the tank system, has the facility complied with 265.196 (p. J9)? 265.194(c)	___	___	_____
Ignitable and reactive waste:			
Is ignitable or reactive waste treated, rendered, or mixed before or immediately after placement in a tank so that the resulting waste no longer meets the definition of ignitability or reactivity? 265.198(a)(1)(i-ii) or:	___	___	_____
Is ignitable or reactive waste stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react? 265.198(a)(2) or:	___	___	_____
Is the tank used solely for emergencies? 265.198(a)(3)	___	___	_____
Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981)? 265.198(b)?	___	___	_____
Are incompatible wastes stored in separate tanks? 265.199(a)	___	___	_____
Is H.W. not placed in non-decontaminated tanks that previously held an incompatible waste or material? 265.199(b)	___	___	_____
Whenever a tank system is to be used to chemically treat or store a H.W. which is substantially different from waste previously handled in the tank, or chemically treat			

Tanks: - Continued
(Part 265 Subpart J)

	Yes	No	Comments
H.W. with a substantially different process than was previously used, did the facility: 265.200-			
(a) Conduct waste analysis and trial treatment or storage tests (bench-tests)? or:	___	___	_____
(b) Have they obtained written documentation on similar storage or treatment of similar waste under similar operating conditions?	___	___	_____
Construction, containment, and assessment:			
If the tank system or component used to treat H.W. was installed after 7/14/86, go to 265.192, new tank systems (next page).	___		_____
If an existing tank system (installation commenced or committed before 7/14/86) with a secondary H.W. containment system, go to 265.193 (page J6).	___		_____
If an existing tank system without complying secondary containment, has the facility determined whether the tank system is either not leaking or unfit for use? 265.191(a)	___	___	_____
If found to be leaking or unfit for use, has the facility complied with 265.196 (page J9)? 265.191(d)	___	___	_____
If fit for use, has the facility obtained a written assessment that attests to the tank system's integrity by 1/12/88*? 265.191(a)	___	___	_____
Was the assessment on file at the facility, and certified by an independent, registered professional engineer? 265.191(a)	___	___	_____
Did the assessment consider: 265.191(b)-			
(1) Original blueprints and standards?	___	___	_____
(2) H.W. characteristics?	___	___	_____
(3) Existing corrosion protection measures?	___	___	_____
(4) Documented age of tank, if known?	___	___	_____
(5) Leak test, internal inspection, or integrity test results?	___	___	_____

* Or within 12 months after their waste is listed as a H.W. 265.191(c)

Tanks: - Continued
(Part 265 Subpart J)

	Yes	No	Comments
Design and installation of new tank systems:			
Does the facility have a tank system or component that is used to treat or store H.W. and was installed after 7/14/86?	___	___	_____
Has the facility obtained an assessment certified by an independent, registered, professional engineer attesting that the tank or component design is acceptable? 265.192(a)	___	___	_____
Did the assessment include: 265.192(a)-			
(1) Construction and design standards?	___	___	_____
(2) Hazardous characteristics of the wastes to be handled?	___	___	_____
(3) Corrosion? (see next page)	___	___	_____
(4) Protection against vehicular traffic?	___	___	_____
(5)(i) Strength of the foundation?	___	___	_____
(5)(ii) Anchoring to prevent flotation or dislodgement?	___	___	_____
(5)(iii) Effects of frost heave?	___	___	_____
Are certifications on file to attest that the installation steps and inspections, and any required repairs, were properly performed? 265.192(g)	___	___	_____
Did the installation include before-use inspection and repair of any: 265.192(b)-			
(1) Weld breaks?	___	___	_____
(2) Punctures?	___	___	_____
(3) Scrapes of protective coating?	___	___	_____
(4) Cracks?	___	___	_____
(5) Corrosion?	___	___	_____
(6) Other damage or inadequacies?	___	___	_____
Was the proper backfilling of underground tanks or components certified? 265.192(c)	___	___	_____
Were all tanks tested (and repaired) for tightness? 265.192(d)	___	___	_____
Were ancillary equipment certifiably supported and protected against physical damage and excessive stress due to settlement, vibration, expansion, and contraction? 265.192(e)	___	___	_____

	Yes	No	Comments
New tank corrosion certification:			
Where the external shell of a metal tank or any metal component touches soil or water, was the tank design and installation supervised and certified by a corrosion expert? 265.192(a)(3)	___	___	_____
Did the corrosion certifications consider these factors: 265.192(a)(3)(i)-			
(A) Soil moisture content?	___	___	_____
(B) Soil pH?	___	___	_____
(C) Soil sulfides level?	___	___	_____
(D) Soil resistivity?	___	___	_____
(E) Structure to soil potential?	___	___	_____
(F) Influence of nearby underground metal structures or piping?	___	___	_____
(G) Stray electric current?	___	___	_____
(H) Existing corrosion-protection measures (coating, cathodic protection, etc.)?	___	___	_____
Was at least one of the following used to ensure tank integrity? 265.192(a)(3)(ii)-			
(A) Corrosion-resistant construction materials such as special alloys, fiberglass-reinforced plastic, etc.?	___	___	_____
(B) Corrosion-resistant coatings such as epoxy or fiberglass?	___	___	_____
(C) Electrical isolation devices such as insulating joints, flanges, etc.?	___	___	_____

Tanks: - Continued
(Part 265 Subpart J)

	Yes	No	Comments
Was a secondary containment system provided for any: 265.193(a)-	___	___	_____
(1) New tank systems or components before installation?	___	___	_____
(2) Existing tanks used to treat or store F020, F021, F022, F023, F026, F027, by 1/12/89?	___	___	_____
(3) Existing tanks of proven age, by the later of 1/12/89 or 15 years old?	___	___	_____
(4) Existing tanks of undocumented age, by 1/12/95, or if the facility was built before 1980, by the later of 1/12/89 or the facility reaching 15 years of age?	___	___	_____
(5) Tank systems that handle materials that became hazardous wastes after 1/12/87, within two years of regulation or the facility reaching 15 years of age?	___	___	_____
If no to above, has a variance been obtained from the RA? 265.193(g)	___	___	_____
Are the containment systems: 265.193(b)-			
(1) Designed, installed, and operated to prevent any releases to soil or water at any time during operation? and:	___	___	_____
(2) Capable of detecting, collecting, and holding releases from the tank?	___	___	_____
To meet these requirements, are the containment systems: 265.193(c)-			
(1) Compatible with wastes handled, and strong enough to prevent failure due to pressure (including groundwater), weather, installation, or daily operations?	___	___	_____
(2) Placed on a foundation that withstands settlement, compression, or uplift?	___	___	_____
(3) Provided with a leak detection system that detects any releases within 24 hours (if possible)?	___	___	_____
(4) Sloped or drained to remove all liquids within 24 hours (if possible)?	___	___	_____

Tanks: - Continued
(Part 265 Subpart J)

	Yes	No	Comments
Does the secondary containment for tanks include one of these devices? 265.193(d)-	___	___	_____
(1) A liner external to the tank?	___		_____
(2) A vault?	___		_____
(3) A double-walled tank? or:	___		_____
(4) An equivalent approved by the RA?	___		_____
If an external liner is used, does it: 265.193(e)(1)-			
(i) Contain 100% of the largest tank?	___	___	_____
(ii) Either prevent run-on or rain from entering, or have added capacity to contain a 25-year, 24-hour storm?	___	___	_____
(iii) Be free of cracks or gaps?	___	___	_____
(iv) Capable of preventing lateral and vertical migration of waste?	___	___	_____
If a vault system is used, does it: 265.193(e)(2)-			
(i) Contain 100% of the largest tank's volume?	___	___	_____
(ii) Either prevent run-on or rain from entering, or have added capacity to contain a 25-year, 24-hour storm?	___	___	_____
(iii) Have any joints sealed?	___	___	_____
(iv) Have an impermeable liner or coating over the concrete?	___	___	_____
(v) Protect against vapor formation from ignitable or reactive wastes?	___	___	_____
(vi) Have an exterior moisture barrier to prevent seep-in?	___	___	_____
If a double-walled tank is used, is it: 265.193(e)(3)-			
(i) One integral structure?	___	___	_____
(ii) Protected from interior and exterior corrosion?	___	___	_____
(iii) Provided with a leak detection system capable of detecting a leak within 24 hours (if possible)?	___	___	_____

Tanks: - Continued
(Part 265 Subpart J)

	Yes	No	Comments
Secondary containment: cont.			
Is all ancillary equipment provided with full secondary containment e.g., trench, jacketing, double-walled pipe? (except for the following if inspected daily for leaks): 265.193(f)-	___	___	_____
(1) Aboveground pipes?	___	___	_____
(2) Welded flanges, joints, and connections?	___	___	_____
(3) Sealless or magnetic coupling pumps?	___	___	_____
(4) Pressurized aboveground piping systems with automatic shut-off devices?	___	___	_____

Tanks: - Continued
(Part 265 Subpart J)

	Yes	No	Comments
Leaks, spills, unfit-for-use tanks:			
If a tank system or secondary containment system has had a leak or spill, or is unfit for use, was it immediately removed from service? 265.196	___	___	_____
Did the facility immediately stop the flow of H.W. into the system, and inspect to determine the cause of the release? 265.196(a)	___	___	_____
If the release was from the tank system, within 24 hours of detection (if possible) did they remove enough waste to prevent further release and allow inspection and repair? 265.196(b)	___	___	_____
If the release was to a secondary containment system, were all released materials removed in 24 hours? 265.196(b)(2)	___	___	_____
If the release was to the environment, did the facility immediately conduct a visual inspection of the release? 265.196(c)- and:	___	___	_____
(1) Contain it to prevent further migration to soils or surface water?	___	___	_____
(2) Remove and properly dispose of any visible contamination of the soil or surface water?	___	___	_____
Was the leak or spill of H.W.: 265.196(d)(2)-			
(i) Less than or equal to one pound? and,	___	___	_____
(ii) Immediately contained and cleaned up?	___	___	_____
If not, was the spill or leak reported to the RA within 24 hours? 265.196(d)(1)	___	___	_____
If the reportable leak was a release to the environment, was a full report submitted to the RA within 30 days of detection? 265.196(d)(3)	___	___	_____
Did the environmental release report include: 265.196(d)(3)-			
(i) Likely route of migration?	___	___	_____
(ii) Characteristics of the surrounding soil composition, geology, hydrogeology, and climate?	___	___	_____
(iii) Results of any monitoring or sampling? (if not, were the results forwarded to the RA as soon as the analysis was received)?	___	___	_____

	Yes	No	Comments
(iv) Proximity to downgradient drinking water, surface water, and population areas?	___	___	_____
(v) A description of response actions taken or planned?	___	___	_____
Repair, containment, or closure:			
If the cause of the release was a spill that did not damage the integrity of the system, was waste removed and necessary repairs made before returning the system to service? 265.196(e)(2)	___	___	_____
If the cause of the release was a leak from the primary tank system into the secondary tank system, was the system repaired before returning to service? 265.196(e)(3)	___	___	_____
If the source of any leak to the environment was from an aboveground, visually accessible component, was it repaired and certified before being returned to service? 265.196(e)(4)	___	___	_____
If the source of any leak to the environment was from a component or tank without secondary containment, and was belowground, (or aboveground but not readily accessible for visual inspection, e.g., the bottom of an onground tank), was the tank or entire component provided with secondary containment (265.193, p. J6) before being returned to service? 265.196(e)(4)	___	___	_____
If the answer to any of the above four questions was no, did the facility close the unit in accordance with 265.197 (p. J11)? 265.196(e)(1)	___	___	_____
If the facility has extensively repaired a tank system that leaked, was the repaired system certified capable by an independent, registered professional engineer? 265.196(f)	___	___	_____
Was the certification submitted to the RA within 7 days after returning the system to use? 265.196(f)	___	___	_____
If a tank system or component was replaced, did it comply with 265.192, new tanks (p. J4)? 265.196(e)(4)	___	___	_____

Tanks: - Continued
(Part 265 Subpart J)

	Yes	No	Comments
Tank closure and post-closure care:			
At closure, did the facility remove or decontaminate all waste residues, contaminated containment system components (liners, etc.), structures, soil, and equipment? 265.197(a)	___	___	_____
If the facility demonstrated that all contaminated soils cannot be removed or decontaminated, did they close the tank and perform post-closure care as if a landfill? 265.197(b)	___	___	_____
If the facility has a tank system without complying secondary containment or an exemption, did they include contingent closure and post-closure plans covering the care and reporting provisions for landfills? 265.197(c)(1-2)	___	___	_____
Did they include the contingent plans in the cost estimate? 265.197(c)(3)	___	___	_____
Did they include the contingent plans' costs in the financial assurance and responsibility estimates? 265.197(c)(4-5)	___	___	_____

See also Subparts G, H.

Surface Impoundments: (Part 265 Subpart K)

	Yes	No	Comments
Has the facility installed two or more liners and a leachate collection system for each new unit, replacement unit, or lateral expansion of an existing unit that has received H.W. after 5/8/85? 265.221(a) or:	___	___	_____
Has the RA approved a waiver? 265.221(c-d)	___	___	_____
For existing interim status H.W. surface impoundments not covered above, did the facility retrofit the impoundment by 11/8/88? HSWA 3005(j)(1) or:	___	___	_____
Did the facility cease accepting H.W. by 11/8/88* and submit a closure plan? HSWA 3005(j)	___	___	_____
If the facility did install double liners and a leachate collection system, did the facility notify the RA at least 60 days prior to receiving waste in the impoundment? 265.221(b) and:	___	___	_____
Within six months of submitting this notice, file a Part B application? 265.221(b)	___	___	_____
Do impoundments have at least 2 feet of freeboard? 265.222(a) or:	___	___	_____
Does the facility have on site an engineer's certification stating what alternative design features prevent overtopping of the dike? 265.222(b)	___	___	_____
Is the freeboard level inspected at least daily? 265.226(a)	___	___	_____
Do earthen dikes have protective cover to minimize wind and water erosion and to preserve their structural integrity? 265.223	___	___	_____
Is the impoundment, including dikes and surrounding vegetation, inspected weekly to detect leaks, deterioration, or failure? 265.226(b)	___	___	_____

* The facility may continue to treat in surface impoundments waste in place before 11/8/88, and may place wastes removed for retrofitting or closure acitivites back into the same impoundment they were removed from.

Surface Impoundments: - Continued
(Part 265 Subpart K)

	Yes	No	Comments
Before the impoundment is used to chemically treat a H.W. which is substantially different from waste previously treated in that impoundment, or chemically treat H.W. with a substantially different process than was previously used, did the facility: 265.225(a)(1-2)			
(i) Conduct waste analysis and trial treatment tests (bench or pilot plant scale)? or:	___	___	_____
(ii) Obtain written documentation on similar treatment of similar waste under similar operating conditions?	___	___	_____
Are incompatible wastes or materials (Appendix V) not placed in the same impoundment unless 265.17(b) is complied with? 265.230	___	___	_____
Are ignitable or reactive wastes treated, rendered or mixed, before or immediately after placement in the impoundment, so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitability or reactivity? 265.229(a)(1-2) or:	___	___	_____
A signed certification by a chemist or engineer is kept on site that the waste is handled in such a way that it is protected from conditions that may cause the waste to ignite or react? 265.229(b)(1-3) or:	___	___	_____
Is the impoundment used solely for emergencies? 265.229(c)	___	___	_____

NOTE: Additional surface impoundment operating, recordkeeping, and waste analysis requirements are detailed in the Part 268: Land Disposal Restrictions checklist.

LDR wastes removed during closure or retrofitting are considered newly generated unless wastes are returned to the same impoundment from which they were removed. Otherwise, any LDR effective dates apply.

Surface Impoundments: - Continued
(Part 265 Subpart K)

	Yes	No	Comments
At closure, has the facility removed or decontaminated, and managed as a H.W., all: 265.228(a)(1)			
Waste residues?	___	___	_____
Containment system components?	___	___	_____
Contaminated subsoils?	___	___	_____
Structures and equipment contaminated with waste and leachate?	___	___	_____
Has the facility closed the impoundment and managed it like a landfill (under Subpart G and 265.310)? including: 265.228(a)(2)-	___	___	_____
(i) Eliminating free liquids by removing wastes or solidifying the remaining wastes and residues?	___	___	_____
(ii) Stabilized remaining wastes to a bearing capacity sufficient to support the final cover?	___	___	_____
Has the facility installed a final cover that: 265.228(a)(2)(iii)-			
(A) Provides long-term minimization of liquid migration?	___	___	_____
(B) Functions with minimum maintenance?	___	___	_____
(C) Promotes drainage and minimizes erosion or abrasion of the cover?	___	___	_____
(D) Accomodates settling and subsidence to maintain cover integrity?	___	___	_____
(E) Has a permeability less than or equal to the bottom liner or natural subsoils?	___	___	_____
Where wastes, waste residues, or contaminated materials remain after closure, during post-closure care (in addition to Subpart G and 265.310 requirements) has the facility: 265.228(b)-			
(1) Maintained the integrity and effectiveness of the final cover, and made repairs as necessary?	___	___	_____
(2) Maintained and monitored the groundwater monitoring system (and complied with all other applicable Subpart F requirements)?	___	___	_____
(3) Prevented run-on and run-off from eroding or damaging the final cover?	___	___	_____

Waste Piles:
(Part 265 Subpart L)

	Yes	No	Comments
Are waste piles covered or protected from dispersal by wind? 265.251	___	___	_____
Is a representative sample of waste from each incoming movement analyzed to determine its compatibility with other waste in the pile? unless: 265.252	___	___	_____
(1) All pile-able wastes the facility receives are compatible? or:	___	___	_____
(2) The waste received is compatible with the waste already in a pile?	___	___	_____
Is the analysis adequate to avoid inadvertant mixing of incompatibles in piles? 265.252	___	___	_____
Does the analysis include a visual comparison of color and texture? 265.252	___	___	_____
For waste piles where the leachate or run-off from the pile is a H.W.: 265.253(a)-			
(1) Is the pile placed on an impermeable base that is compatible with the waste?	___	___	_____
(2) Is there a run-on control system capable of handling a 25-year storm?	___	___	_____
(3) A run-off control system capable of handling a 24-hour, 25-year storm?	___	___	_____
(4) Are collection and holding units (tanks and basins) for run-on and run-off promptly emptied or managed to maintain design capacity?	___	___	_____
If no to (1)-(4) above, is: 265.253(b)-			
-(1) The pile protected from precipitation and run-on by some other means (roof)? and:	___	___	_____
(2) Are no liquids, or wastes containing free liquids, placed in the pile?	___	___	_____
Has the facility installed a liner and a leachate collection system for each new unit, replacement unit, or lateral expansion of an existing unit that has received waste after 5/8/85? 265.254	___	___	_____

Waste Piles: - Continued
(Part 265 Subpart L)

	Yes	No	Comments
For facilities that add ignitable or reactive wastes to an existing pile, can they demonstrate that: 265.256(a)-			
(1) The resulting waste mixture no longer meets the definition of ignitable or reactive waste and the mixing will not cause uncontrolled ignition or reaction? or:	___	___	_____
(2) The waste is protected from materials or conditions that might cause them to ignite or react?	___	___	_____
Does the facility ensure that incompatible wastes and materials are not placed in the same waste pile unless 165.17(b) is complied with? 265.257(a)	___	___	_____
Are piles of H.W. that are incompatible with materials stored nearby separated by sufficient distance or protected by some structural device, e.g., a dike, wall or berm? 265.257(b)	___	___	_____
Are H.W. not placed on the same area where incompatible wastes were previously piled, unless the area has been sufficiently decontaminated? 265.257(c)	___	___	_____
At closure, has the facility removed or decontaminated, and managed as a H.W., all: 265.258(a)			
Waste residues?	___	___	_____
Contaminated containment system components?	___	___	_____
Contaminated subsoils?	___	___	_____
Structures and equipment contaminated with waste and leachate?	___	___	_____
If no, has closure and post-closure care as a landfill been performed? 265.258(b)	___	___	_____

Land Treatment:
(Part 265 Subpart M)

	Yes	No	Comments
Is the H.W. treated in the land treatment unit capable of biological or chemical degradation? 265.272(a)	___	___	_____
Is there a run-on control system designed, constructed, operated, and maintained to keep flow off the active portions of the facility during peak discharge from at least a 25-year storm? 265.272(b)	___	___	_____
Is there a run-off management system designed, constructed, operated, and maintained to collect and control a volume of water at least equivalent to a 24-hour, 25-year storm? 265.272(c)	___	___	_____
Are collection and holding facilities associated with run-on and run-off control systems managed to maintain the design capacity of the system? 265.272(d)	___	___	_____
Is the treatment zone managed to control particulate wind dispersal? 265.272(e)	___	___	_____
Before placing H.W. in or on a land treatment unit, has the facility determined the following: 265.273-			
(a) Concentrations in the waste of any substance that cause a waste to exhibit the EP toxicity characteristic?	___	___	_____
(b) For any waste listed in Part 261, Subpart D, the concentration of any substance which caused the waste to be listed as a H.W.?	___	___	_____
(c) If food chain crops are grown (see 265.276, p. M3), the concentrations in the waste of arsenic, cadmium, lead, and mercury unless written, documented data shows that the constituent is not present?	___	___	_____
Unsaturated Zone Monitoring:			
Has the facility implemented an unsaturated zone monitoring plan? 265.278(a)	___	___	_____
Is the plan and the rationale used to develop the plan kept at the facility? 265.278(d)	___	___	_____

Land Treatment: - Continued
(Part 265 Subpart M)

	Yes	No	Comments
Is the plan designed to detect vertical migration of H.W. and H.W constituents under active portions of the land treatment unit? 265.278(a)(1)	___	___	_____
Does the plan provide information on the background concentrations of H.W. and H.W. constituents in similar but untreated soils nearby? 265.278(a)(2)	___	___	_____
Is the background monitoring conducted before or in conjunction with the migration monitoring? 265.278(a)(2)	___	___	_____
Does the plan include: 265.278(b)-			
(1) Soil-monitoring using soil cores?	___	___	_____
(2) Soil-pore water monitoring using devices such as lysimeters?	___	___	_____
Has the facility demonstrated in their unsaturated zone monitoring plan that: 265.278(c)-			
(1) The depth at which soil and soil-pore water samples are taken is below the depth to which the waste is incorporated into the soil?	___	___	_____
(2) The number of soil and soil-pore water samples to be taken is based on the variability of the H.W. constituents in the waste and in the soil, and the soil type(s)?	___	___	_____
(3) The frequency and timing of soil and soil-pore water sampling is based on the frequency, time, and rate of waste application, proximity to groundwater, and soil permeability?	___	___	_____
Does the facility analyze the soil and soil-pore water samples for the same H.W. constituents that were found during the waste analysis? 265.278(e)	___	___	_____
Are records kept regarding application dates and rates, quantities, and locations of all H.W. placed in the land treatment unit? 265.279	___	___	_____

Land Treatment: - Continued
(Part 265 Subpart M)

	Yes	No	Comments
Are ignitable or reactive wastes immediately incorporated into the soil so that the resulting waste mixture no longer meets the definition of ignitable or reactive waste, and 265.17(b) is complied with? 265.281(a)(1-2) or:	___	___	_____
Is the waste is managed in such a way that it is protected from conditions which may cause it to ignite or react? 265.281(b)	___	___	_____
Does the facility ensure that incompatible wastes are not placed in the same unit, unless 265.17(b) is complied with? 265.282	___	___	_____
Food chain crops:			
Has the facility notified the RA of any land treatment units on which food chain crops are or will be grown? 276.276(a)	___	___	_____
Has the facility conducted field tests before food chain crops are grown on the treated area that demonstrate any arsenic, lead, mercury, or listed H.W. constituents: 265.276(b)(1)-			
(i) Will not be transferred to the food portion of the crop by plant uptake or direct contact, and will not be ingested by food chain animals (e.g. by grazing)? or:	___	___	_____
(ii) Will not occur in greater concentrations in the crops grown on the land treatment field than in crops grown on untreated soils?	___	___	_____
Are these test results kept at the facility? Did they include: 265.275(b)(2)-	___	___	_____
(i) Evidence basing the tests on the specific waste and application rates being used at the facility?	___	___	_____
(ii) Descriptions of crop and soil characteristics, sample selection criteria, sample size determination, analytical methods, and statistical procedures?	___	___	_____

Land Treatment: - Continued
(Part 265 Subpart M)

	Yes	No	Comments
If food chain crops are grown on a land treatment facility that receives waste containing cadmium, has the facility complied with the requirements of either 265.276(c)(1) or -(2)? 265.276(c)	___	___	_____
Closure and Post-Closure:			
Does the closure plan and post-closure plan address the following objectives and indicate how they will be achieved: 265.280(a)-			
(1) Control of migration of H.W. and H.W. constituents from the treatment zone into the ground-water?	___	___	_____
(2) Control of the release of contaminated run-off from the unit into surface water?	___	___	_____
(3) Control of the release of airborne particulate contaminants caused by wind erosion?	___	___	_____
(4) Compliance with 265.276 (growth of food chain crops)?	___	___	_____
Were the following factors considered in addressing the closure and post-closure care objectives: 265.280(b)-			
(1) Type and amount of H.W. and H.W. constituents applied to the land treatment unit?	___	___	_____
(2) Mobility and expected rate of migration of H.W. and H.W. constituents?	___	___	_____
(3) Site location, topography, and surrounding land use with respect to the potential effects of pollutant migration (e.g., proximity to ground water, surface water and drinking water sources)?	___	___	_____
(4) Climate, including amount, frequency and pH of precipitation?	___	___	_____

	Yes	No	Comments
(5) Geological and soil profiles; surface & subsurface hydrology of the site; soil characteristics, including cation exchange capacity, total organic carbon, and pH?	___	___	_____
(6) Unsaturated zone monitoring information?	___	___	_____
(7) Type, concentration, and depth of migration of H.W. constituents in the soil as compared to their background concentrations?	___	___	_____
Did the closure and post-closure care plan include considerations for removal of contaminated soil? 265.280(c)(1)	___	___	_____
Did the closure and post-closure care plan include considerations for the placement of the final cover, including: 265.280(c)(2)-			
(i) Functions of the cover (e.g., infiltration control, erosion and run-off control, and wind erosion control?	___	___	_____
(ii) Characteristics of the cover, including material, final surface contours, thickness, porosity and permeability, slope, length of run of slope and type of vegetation on the cover?	___	___	_____
Do the plans address ground-water monitoring? 265.280(c)(3)	___	___	_____
Does the closure plan provide for the following during the closure period: 265.280(d)-			
(1) Continuation of the unsaturated zone monitoring program (soil-pore liquid monitoring may be terminated 90 days after the last application of waste)?	___	___	_____
(2) Maintenance of run-on control systems?	___	___	_____
(3) Maintenance of the run-off management systems?	___	___	_____
(4) Controlling wind dispersal of particulates?	___	___	_____

Land Treatment: - Continued
(Part 265 Subpart M)

	Yes	No	Comments
At closure, has the facility submitted to the RA a certification signed by the owner/operator and an independent soil scientist or registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan? 265.280(e)	___	___	_____
Does the post-closure plan provide for the following during the post-closure care period: 265.280(f)-			
(1) Continuation of the soil-core monitoring program?	___	___	_____
(2) Restricting access to the unit as appropriate?	___	___	_____
(3) Assuring that growth of food chain crops complies with 265.276?	___	___	_____
(4) Controlling wind dispersal of H.W.?	___	___	_____

Landfills:
(Part 265 Subpart N)

	Yes	No	Comments
Has the facility installed two or more liners and leachate collection systems above and between the liners for each new unit, replacement unit, or lateral expansion of an existing unit that has received waste after 5/8/85? 265.301(a) or:	___	___	_____
Has the RA approved a waiver? 265.301(c-d)	___	___	_____
If the facility did install double liners and leachate collection systems, did the facility notify the RA at least 60 days prior to receiving waste in the landfill? 265.301(b)	___	___	_____
Within six months of submitting this notice, did the facility then file a Part B application? 265.301(b)	___	___	_____
Is the run-on control system capable of preventing flow onto active portions during peak discharge from a 25-year storm? 265.302(a)	___	___	_____
Is the run-off management system capable of collecting and controlling the water volume resulting from a 24-hour, 25-year storm? 265.302(b)	___	___	_____
After storms are the run-on and run-off control systems returned to their design capacities? 265.302(c)	___	___	_____
Are H.W. managed to prevent wind dispersal? 265.302(d)	___	___	_____
Does the facility maintain the following items in the operating record: 265.309-			
(a) On a map, the exact location, dimensions and depth of each cell with respect to permanently surveyed benchmarks?	___	___	_____
(b) The contents of each cell and the location of each H.W. type within each cell?	___	___	_____
Are incompatible wastes and materials not placed in the same landfill cell unless 265.17(b) is complied with? 265.313	___	___	_____

Landfills: - Continued
(Part 265 Subpart N)

	Yes	No	Comments
Requirements For Ignitable Or Reactive Wastes:			
Are ignitable or reactive wastes treated, rendered, or mixed before or immediately after placement in the landfill so that the resulting waste, mixture, dissolution, or material no longer exhibits the characteristics of ignitability or reactivity, and 265.17(b) is complied with? 265.312(a)	___	___	_____
Requirements For Ignitable Wastes Disposed Of In Containers: 265.312(b)			
Are wastes protected from materials or conditions which may cause them to ignite?	___	___	_____
Are wastes disposed of in non-leaking containers?	___	___	_____
Are wastes carefully handled and placed so as to avoid heat or sparks?	___	___	_____
Are wastes covered daily with soil?	___	___	_____
Are wastes not disposed in cells that contain other wastes which may generate heat and cause ignition?	___	___	_____

Landfills: - Continued
(Part 265 Subpart N)

	Yes	No	Comments
For facilities that accepted bulk liquid H.W. or waste containing free liquids between 11/19/81 and 5/8/85, did: 265.314(a)-			
(1) The landfill have a complying liner and leachate collection and removal system? or:	___	___	_____
(2) Before disposal, were the liquids treated or stabilized, chemically or physically (mixed with absorbents, etc.), so that free liquids were no longer present?	___	___	_____
Have no bulk or containerized H.W.s containing free liquids (even if mixed with absorbents) been placed in the landfill after 5/8/85? 265.314(b)	___	___	_____
Have no liquids, even if not a H.W., been placed in a landfill after 11/8/85, unless the RA has granted an exemption? 265.314(f)	___	___	_____
For landfills that accepted liquids in containers after 3/22/82, was all free-standing liquid handled by one of the following means prior to disposal: 265.314(c)-			
(1)(i) Removed by decanting?	___	___	_____
(1)(ii) Eliminated, by mixing with absorbent or solidification?	___	___	_____
(1)(iii) Otherwise eliminated?	___	___	_____
(2) Contained in an ampule or other very small container?	___	___	_____
(3) Held in a container designed to hold free liquids for use other than storage, such as a battery or capacitor?	___	___	_____
(4) In a labpack? (see also next page)	___	___	_____
Was the paint filter test (Method 9095, SW-846) used to make any determinations of free liquids? 265.314(d)	___	___	_____

Landfills: - Continued
(Part 265 Subpart N)

	Yes	No	Comments
Unless very small (such as an ampule), were containers either: 265.315-			
(a) At least 90% full when buried? or:	___	___	_____
(b) Crushed flat, shredded, or similarly reduced in volume before they are buried in the landfill?	___	___	_____
Are lab packs placed in the landfill: 265.316-			
(a) Packaged in inside containers that are:			
Non-leaking?	___	___	_____
Compatible with the waste?	___	___	_____
Securely sealed?	___	___	_____
In compliance with any DOT specs?	___	___	_____
(b) Overpacked in an open head DOT spec metal drum of 110 G or less?	___	___	_____
Surrounded with a sufficient quantity of aborbent material to completely absorb all liquid contents?	___	___	_____
Packed with absorbent until the overpack drum is full?	___	___	_____
(c) Contain absorbent material that is compatible with the waste?	___	___	_____
(d) Not contain incompatible wastes placed in the same drum?	___	___	_____
Are reactive wastes, other than cyanide- or sulfide-bearing wastes, treated or rendered non-reactive prior to placement in lab packs? 265.316(e)	___	___	_____

Landfills: - Continued
(Part 265 Subpart N)

	Yes	No	Comments
Closure and Post-Closure:			
At final closure of the landfill or any cell, has a final cover been placed over the unit that is designed to: 265.310(a)-			
(1) Provide long-term minimization of migration of liquids through the closed landfill?	___	___	_____
(2) Function with minimum maintenance?	___	___	_____
(3) Promote drainage and prevent erosion or abrasion of the cover?	___	___	_____
(4) Accomodate settling and subsidence to maintain the cover's integrity?	___	___	_____
(5) Have a permeability less than or equal to that of the bottom liner or natural subsoils?	___	___	_____
During post-closure, has the facility: 265.310(b)-			
(1) Maintained the integrity and effectiveness of the final cover, and made repairs as neccessary?	___	___	_____
(2) Maintained and monitored the groundwater monitoring system (and complied with all other applicable Subpart F requirements)?	___	___	_____
(3) Prevented run-on and run-off from eroding or damaging the final cover?	___	___	_____
(4) Protected and maintained surveyed benchmarks?	___	___	_____

See also land-disposal facility closure requirements, Subparts G and H.

Incinerators:
(Part 265 Subpart O)

	Yes	No	Comments
Does the facility operate a H.W. incinerator*? 265.340(a)(1-2)	___	___	_____
Has the facility documented that no wastes expected to contain Appendix VIII constituents are burned? and: 265.340(b)	___	___	_____
Is documentation on site that the waste is listed as a H.W. solely because it is: 265.340(b)-			
(1) Ignitable and/or corrosive (Subart D, Hazard Code I or C)?	___	___	_____
(2) Reactive (Code R), does not emit toxic fumes, and will not be burned along with any other H.W.?	___	___	_____
(3) Has ignitable and/or corrosive characteristics (Subpart C)?	___	___	_____
(4) Has a reactive characteristic (Subpart C) and is handled per Code R above?	___	___	_____
If yes to the previous two questions, the facility is exempt from Subpart O. See also 266, Subparts D and E.			
Does the facility conduct waste analysis for each new waste sufficient to enable them to establish neccessary steady state conditions and what pollutants might be emitted? 265.341	___	___	_____
Does the waste analysis consider: 265.341-			
(a) Heating value?	___	___	_____
(b) Halogen and sulfur content?	___	___	_____
(c) Concentrations of lead and mercury, unless written documentation show they are not present?	___	___	_____
-Is waste not fed to the incinerator during start-up and shut-down unless the incinerator has reached steady state conditions? 265.345	___	___	_____

* An incinerator is an enclosed device using controlled flame combustion; an industrial boiler or furnace used to destroy wastes by burning; or an industrial furnace for any recycling purpose that elects to be regulated under this subpart.

Incinerators: -Continued
(Part 265 Subpart O)

	Yes	No	Comments
Does the facility monitor existing temperature and emission control devices every 15 minutes of operation, including those measuring: 265.347(a)			
Waste feed?	___	___	_____
Auxiliary fuel feed?	___	___	_____
Air flow?	___	___	_____
Incinerator temperature?	___	___	_____
Scrubber flow and pH?	___	___	_____
Process flow and level controls?	___	___	_____
Were appropriate corrections to maintain appropriate steady state conditions made immediately? 265.347(a)	___	___	_____
Is the complete unit, including pumps, valves, conveyors, pipes, emergency shutdown controls, system alarms etc., inspected daily for leaks, spills, and fugitive emissions? 265.347(b)	___	___	_____
Has the facility received performance certification from the EPA before incinerating: 265.352			
F020: tri-or tetrachlorophenol?	___	___	_____
F021: pentachlorophenol?	___	___	_____
F022: tetra-, penta-, or hexachloro-benzenes (alkaline conditions)?	___	___	_____
F023: wastes from F020 equipment?			
F026: wastes from F022 equipment?	___	___	_____
F027: discarded unused formulations of tri-, tetra-, or pentachloro-phenol and derivatives?	___	___	_____
At closure, was all H.W. and H.W. residues, including ash, removed from the equipment? 265.351	___	___	_____

Other Thermal Treatment:
(Part 265 Subpart P)

	Yes	No	Comments
Does the facility thermally treat H.W. in devices other than incinerators? (If "an enclosed device using controlled flame combustion", the unit is an incinerator.) 265.370	___	___	_____
If the device is a batch treatment unit, is a complete thermal cycle used to treat each batch of H.W.? 265.373	___	___	_____
If not a batch process, does the facility bring the unit up to steady state (normal) operating temperature and conditions before adding H.W.? 265.373	___	___	_____
Does the facility conduct waste analysis for each new waste sufficient to enable them to establish neccessary steady state conditions and what pollutants might be emitted? 265.375	___	___	_____
Does the waste analysis consider: 265.375-			
(a) Heating value?	___	___	_____
(b) Halogen and sulfur content?	___	___	_____
(c) Concentrations of lead and mercury, unless written documentation show they are not present?	___	___	_____
Does the facility monitor existing temperature and emission control devices every 15 minutes of operation, including those measuring: 265.377(a)(1)			
Waste feed?	___	___	_____
Auxiliary fuel feed?	___	___	_____
Treatment process temperature?	___	___	_____
Process flow and level controls?	___	___	_____
Were any corrections to maintain appropriate steady state conditions made immediately? 265.377(a)(1)	___	___	_____
Is the stack plume observed hourly for normal color and opacity, and any corrections made immediately? 265.377(a)(2)	___	___	_____
Is the complete unit, including pumps, valves, conveyors, pipes, emergency shutdown controls, system alarms etc., inspected daily for leaks, spills, and fugitive emissions? 265.377(a)(3)	___	___	_____

Other Thermal Treatment: -Continued
(Part 265 Subpart P)

	Yes	No	Comments
Has the facility received performance certification from the EPA before thermally treating: 265.383			
F020: tri-or tetrachlorophenol?	___	___	_____
F021: pentachlorophenol?	___	___	_____
F022: tetra-, penta-, or hexachloro-benzenes (alkaline conditions)?	___	___	_____
F023: wastes from F020 equipment?			
F026: wastes from F022 equipment?	___	___	_____
F027: discarded unused formulations of tri-, tetra-, or pentachloro-phenol and derivatives?	___	___	_____
At closure, was all H.W. and H.W. residues, including ash, removed from the equipment? 265.381	___	___	_____
Open burning of H.W. explosives:			
Does the facility open burn or detonate only waste explosives or military propellants ? 265.382	___	___	_____
Do they comply with the following minimum specifications? 265.382	___	___	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others
0 to 100.....	670 feet (204 meters)
101 to 1,000.....	1,250 feet (360 meters)
1,001 to 10,000.....	1,730 feet (530 meters)
10,001 to 30,000.....	2,260 feet (690 meters)

(5280 feet = one mile)

Chemical, Physical, and Biological Treatment:
(Part 265 Subpart Q)

	Yes	No	Comments
Does the facility treat H.W. by chemical, physical, or biological methods other than in tanks, surface impoundments, or land treatment facilities? 265.400	___	___	_____
Does the treatment comply with 265.17(b)? 265.401(a)	___	___	_____
Are H.W. or treatment reagents not placed in the unit if they could cause the equipment to rupture, leak, corrode, or otherwise fail? 265.401(b)	___	___	_____
Where H.W. is continuously fed into a treatment process, is there a means to stop this inflow (e.g., a waste feed cut-off or by-pass system)? 265.401(c)	___	___	_____
Before the unit is used to chemically treat a H.W. which is substantially different from waste previously treated, or chemically treat H.W. with a substantially different process than was previously used, did the facility: 265.402(a)(1-2)			
(i) Conduct waste analysis and trial treatment tests (bench or pilot plant scale)? or:	___	___	_____
(ii) Obtain written documentation on similar treatment of similar waste under similar operating conditions?	___	___	_____
Does the facility: 265.403(a)-			
(1) Inspect any discharge control equipment (e.g., waste feed cut-off or by-pass systems, drainage systems, pressure relief systems) daily?	___	___	_____
(2) Gather data from monitoring equipment (e.g., pressure and temperature gauge) at least daily to ensure the unit is operating correctly?	___	___	_____
(3) Inspect for leaking of seams and fixtures, leaks, or corrosion weekly?	___	___	_____
(4) Inspect discharge confinement structures (dikes) for leaks (wet spots, dead vegetation) weekly?	___	___	_____

Chemical, Physical, and Biological Treatment: Continued
(Part 265 Subpart Q)

	Yes	No	Comments
Are ignitable or reactive waste treated, rendered, or mixed before or immediately after placement in the unit so that the resulting waste no longer meets the definition of ignitability or reactivity? 265.405(a)(1)(i) or:	___	___	_____
Are ignitable or reactive waste treated in such a way that it is protected from conditions which may cause the waste to ignite or react? 265.405(a)(2)	___	___	_____
Are incompatible wastes or materials not placed in the same unit unless 265.17(b) is complied with? 265.406(a)	___	___	_____
Is H.W. not placed in unwashed treatment equipment that previously held an incompatible waste or material (unless 265.17(b) is complied with)? 265.406(b)	___	___	_____
At closure, has the facility removed all H.W. and H.W. residues from the treatment proceesses or equipment, discharge control equipment and confinement structures? 265.404	___	___	_____

Recyclable Materials Used in a Manner Constituting Disposal
(Part 266 Subpart C)

	Yes	No	Comments
Does the facility handle recyclable materials that are placed on or applied to the land? 266.20(a)(1-2) If yes:	___	___	_____
Is this material either a commercial fertilizer, or a product produced for use by the general public? and: 266.20(b)	___	___	_____
The recyclable materials have been chemically bound to the commercial product, and cannot be separated by physical means? and:	___	___	_____
The products meet the applicable treatment or prohibition standards in Part 268 Subpart D (see checklist) for each recyclable H.W. constituent they contain?*	___	___	_____
If no to any of 266.20(b) above, did the facility comply with all RCRA TSD facility requirements? 266.21, -22, -23	___	___	_____
If the recyclable materials used in a manner constituting land disposal were regulated under Part 268, did the recycler submit a certification (see 268.7(b)(5)), and a notice listing the EPA H.W. number, corresponding treatment standard, and any analysis, to the R.A.? 268.7(b)(8) and:	___	___	_____
Has the recycler kept records of the name and location of each entity receiving the waste-derived product? 268.7(b)(8)	___	___	_____
Has the facility not sprayed waste and/or -used oil contaminated with dioxin or any other H.W. (except those listed solely for ignitability) on roads for dust suppression or road treatment? 266.23(b)	___	___	_____

*** Except zinc-containing fertilizers using H.W. K061 that are produced for the general public's use. They are exempt. 266.20(b)**

Hazardous Waste Burned for Energy Recovery:
(Part 266 Subpart D)

	Yes	No	Comments
Does the facility handle hazardous wastes (including fuels produced from H.W. by blending, processing, or other treatment) that are burned for energy recovery in a boiler or industrial furnace*? 266.30(a)	___	___	_____
Are these H.W. fuels exempt from this Subpart because they are: 266.30-			
(a) Gas recovered from H.W. management activities and burned for energy recovery?	___		_____
(b)(1) Used oil that is a H.W. solely because it exhibits a Part 261 Subpart C characteristic? See 266 Subpart E, Used Oil Burned for Energy Recovery.	___		_____
(b)(2) Wastes that are exempt under Part 261.4 (Exclusions), or 261.6(a)(3)(v-ix)?	___		_____
(b)(2) From conditionally-exempt small quantity generators (261.5)?	___		_____
Does the facility ensure that no fuel which contains H.W. is burned in any cement kiln which is located within the boundaries of any incorporated municipality with a population >500,000 unless the kiln fully complies with incinerator regulations? 266.31(c)	___	___	_____
If the facility generates or initiates a shipment of H.W. fuel, have they complied with Part 262 (generator) requirements? 266.32(a) and 266.34(d)	___	___	_____
If the facility transports H.W. fuel or H.W. used to produce a fuel, have they complied with Part 263 (transporter) requirements? 266.33	___	___	_____
If the facility stores H.W. fuel, have they complied with all applicable H.W. storage facility regulations? 266.34(c), 266.35(c)(1-3)	___	___	_____

* except incinerators regulated under 265 Subpart O. Boilers must meet the specifications defined on -266: Definitions-

	Yes	No	Comments
Marketers:			
Does the facility market H.W. fuel? (e.g., generators who market H.W. fuel directly to a burner, distributors of H.W. fuel, facilities that receive H.W. from generators and produce, process, or blend H.W. fuel.) 266.34	___	___	_____
Have they notified the EPA of their H.W. fuel activity (even if they previously notified of other H.W. management and received an EPA ID #)? 266.34(b)	___	___	_____
Before they initiate the first shipment of H.W. fuel to a burner or another marketer, did the facility obtain a one-time written and signed notice from the recipient certifying that:			
The burner or marketer has notified EPA and identified his waste-as-fuel activities? 266.34(a), 266.34(e)(1)(i)	___	___	_____
If the recipient is a burner, the burner will burn H.W. fuel only in a unit identified in 266.31(b) (p. D3)? 266.34(a), 266.34(e)(1)(ii)	___	___	_____
Before a marketer accepts the first shipment of H.W. fuel from another marketer, has he provided the other marketer with the notice described above? 266.34(e)(2)	___	___	_____
Has the marketer kept copies of each certification notice received or sent for three years from the date he last engages in H.W. fuel transactions with each person? 266.34(f)	___	___	_____

	Yes	No	Comments
Burners:			
Has the facility* that burns H.W. fuel: 266.35-			
(a) Met 266.31(b) below?	___	___	_____
(b) Notified the EPA of their H.W. fuel activity (even if they previously notified of other H.W. management and received an EPA ID #)? 266.35(b)	___	___	_____
Before the burner accepts the first shipment of H.W. fuel from a marketer, did the burner provide a one-time written and signed notice certifying that: 266.35(d)-			
(1) He has notified EPA and identified his waste-as-fuel activities?	___	___	_____
(2) He will burn the fuel only in a unit identified in 266.31(b) below?	___	___	_____
Has the burner kept copies of each certification notice sent to a marketer for three years from the date he last receives H.W. fuel from the marketer? 266.35(e)	___	___	_____

Prohibitions:

Hazardous waste fuel may be burned for energy recovery in only the following devices: 266.31(b)-

(1) Industrial furnaces, as defined in 260.10 (see p. -266: Definitions-).

- (2) Boilers, as defined in 260.10 (see p. -266: Definitions-), that are identified as follows:

(i) Industrial boilers located on the site of a facility engaged in a manufacturing process where substances are transformed into new products, including the component parts of products, by mechanical or chemical processes; or

(ii) Utility boilers used to produce electric power, steam, or heated or cooled gases or fluids for sale.

* Includes generators that burn their own H.W. fuel on-site.

Used Oil Burned for Energy Recovery:
(Part 266 Subpart E)

	Yes	No	Comments
Does the facility handle used oil burned for energy recovery in any boiler or industrial furnace (except 265 Subpart O incinerators)?* 266.40(a)	___	___	_____
Does the used oil fuel burned for energy recovery meet the qualifications: 266.40-			
Contains H.W. from conditionally exempt small quantity (261.5) generators only? -(d)(2) or:	___	___	_____
Has not been mixed with H.W. and exhibits only 261 Subpart C H.W. characteristics? -(c), -(d)(1) and:	___	___	_____
Contains no more than 1,000 ppm total halogens**? -(c)	___	___	_____

If no, the used oil is a H.W. fuel. Go to 266 Subpart D. 266.40(c)-(d)(2)

USED OIL EXCEEDING ANY SPECIFICATION LEVEL
IS SUBJECT TO THIS SUBPART WHEN BURNED
FOR ENERGY RECOVERY***

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
ARSENIC (As)	5 ppm maximum
CADMIUM (Cd)	2 " "
CHROMIUM (Cr)	10 " "
LEAD (Pb)	100 " "
FLASH POINT	100 °F minimum
TOTAL HALOGENS	4,000 ppm maximum**

* "Used oil" means any oil that has been refined from crude oil, used, and, as a result of such use, is contaminated by physical or chemical impurities. "Used oil fuel" includes any fuel produced from used oil by blending, processing, or other treatment. 266.40(a) See also p. -266: Definitions-.

** Used oil containing >1,000 ppm total halogens is presumed to be a H.W. (due to mixing with other H.W.s) until successfully rebutted (i.e, demonstrated not to contain App. VIII halogenated hazardous constituents).

*** The specifications do not apply if mixed with any H.W. not from a conditionally-exempt SQG.

Used Oil Burned for Energy Recovery: - Continued
(Part 266 Subpart E)

	Yes	No	Comments
Does the facility market* used oil fuel? 266.43(a)	___	___	_____
Is the facility exempt from marketer reg.s because they: 266.43(a)-			
(1) Are used oil generators, or collectors who transport used oil received only from generators, who do not market directly to a person who burns it for energy recovery? or:	___	___	_____
(1) Market to burners who are only burning some of the used oil fuel incidentally to processing or other treatment before they then market? or:	___	___	_____
(2) Only market used oil fuel that another facility has already claimed meets the specifications?	___	___	_____
If the facility is the first to claim the used oil meets specifications (and is thus exempt) have they: 266.43(b)(1), 266.43(b)(6)-			
(i) Kept copies of the analysis or determination for three years?	___	___	_____
(ii) Recorded in an operating log:			
(A) The name and address of the facility receiving the shipment?	___	___	_____
(B) The quantity delivered?	___	___	_____
(C) The date of shipment or delivery?	___	___	_____
(D) A cross-reference to the analysis?	___	___	_____
Have they notified EPA their used oil management activity, even if they previously notified of other H.W. management and received an EPA ID #? 266.43(b)(3)	___	___	_____
-Before they initiate the first shipment of off-spec. used oil to a burner or another marketer, did the facility obtain a one-time written and signed notice from the recipient certifying that:			
The burner or marketer has notified EPA as above? 266.41(a), 266.43(b)(5)(A)	___	___	_____

*e.g., generators who market used oil fuel directly to a burner, distributors of used oil fuel, facilities that receive used oil from generators and produce, process, or blend used oil fuel.

Used Oil Burned for Energy Recovery: - Continued
(Part 266 Subpart E)

	Yes	No	Comments
If the recipient is a burner, the burner will burn the fuel only in a unit identified in 266.41(b) (p. E4)? 266.43(a), 266.43(b)(5)(B)	___	___	_____
Before a marketer accepts the first shipment of off-spec. used oil from another marketer, has he provided the other marketer with the notice just described? 266.43(b)(5)(B)(ii)	___	___	_____
Has the marketer kept copies of each certification notice received or sent for three years from the date he last engages in off-spec. used oil transactions with each person? 266.43(b)(6)(ii)	___	___	_____
Before the facility initiates a shipment of off-specification used oil, did they send an invoice to the receiving facility containing: 266.43(b)(4)-			
(i) An invoice number?	___	___	_____
(ii) The sender and receiver's ID No.s?	___	___	_____
(iii) The names and addresses of both facilities?	___	___	_____
(iv) The quantity of off-spec. used oil to be delivered?	___	___	_____
(v) The dates of shipment or delivery?	___	___	_____
(vi) The following statement: "This used oil is subject to EPA regulation under 40 CFR Part 266"?	___	___	_____
Has the facility kept copies of invoices received or sent for three years? 266.43(6)(ii)	___	___	_____
Burners:			
Has the facility that burns off-specification used oil fuel: 266.44-			
(a) Met 266.41(b) (next page)?	___	___	_____
(b) Notified the EPA stating their location and describing their used oil management activity (even if they previously notified of other H.W. mangement and received an EPA ID No.)*? 266.43(b)	___	___	_____

* Except facilities using oil-fired space heaters under 266.41(b)(2), next page.

Used Oil Burned for Energy Recovery: - Continued
(Part 266 Subpart E)

	Yes	No	Comments
Before the burner accepts the first shipment of off-specification used oil fuel from a marketer, did the burner provide a one-time written and signed notice certifying that: 266.44(c)-			
(1) He has notified EPA as required?	___	___	_____
(2) He will burn the fuel only in a unit identified in 266.41(b) below?	___	___	_____
Has the burner kept copies of the one-time certification notice for three years after he last received oil from the marketer? 266.44(e)			
Has the burner kept copies of each invoice received for three years? 266.44(e)	___	___	_____
If the facility burns their own used oil fuel, have they either complied with all burner requirements or obtained analysis documenting that the used oil meets specifications? 266.44(d)(1)	___	___	_____
If the burner treats off-specification used oil by processing, blending, or other treatment to meet the specifications, have they obtained analysis documenting the used oil now meets specifications? 266.44(d)(2)	___	___	_____
Has the burner kept the analyses for three years? 266.44(e)	___	___	_____

Prohibitions: Off-specification used oil may be burned for energy recovery only in the following devices: 266.41(b)-

(1) Industrial furnaces, as defined in 260.10 (see p. 266: Definitions).

- (2) Boilers, as defined in 260.10 (see p. 266: Definitions), that are identified as follows:
  - (i) Industrial boilers located on the site of a facility engaged in a manufacturing process where substances are transformed into new products, including the component parts of products, by mechanical or chemical processes;
  - (ii) Utility boilers used to produce electric power, steam, or heated or cooled gases or fluids for sale; or
  - (iii) Used oil-fired space heaters provided that:
    - (A) The heater burns only used oil that the owner or operator generates or used oil received from do-it-yourself oil changers who generate used oil as household waste;
    - (B) The heater is designed to have a maximum capacity of not more than 0.5 million Btu per hour; and
    - (C) The combustion gases from the heater are vented to the ambient air.

Recyclable Materials Utilized for Precious Metals Recovery
(Part 266 Subpart F)

	Yes	No	Comments
Does the facility generate, transport, or store recyclable materials that are reclaimed to recover economically significant amounts of gold, silver, platinum, paladium, irridium, osmium, rhodium, ruthenium, or any combination of these? 266.70(a)	___	___	_____
Has the facility complied with the applicable requirements of: 266.70(b)-			
(1) RCRA 3010 Notifications?	___	___	_____
(2) Subpart B of 262 (generators)?	___	___	_____
263.20 and 263.21 (transporters)?	___	___	_____
265.71 and 265.72 (storers)?	___	___	_____
If the facility stores these materials, have they kept the following records to document they are not accumulating speculatively? 266.70(c)-			
(1) Volume of materials stored at the beginning of the calendar year?	___	___	_____
(2) Amount of materials generated or received during the calendar year?	___	___	_____
(3) Amount of materials remaining at the end of the calendar year?	___	___	_____
Was the amount recycled (or transferred to another facility for recycling) during the year at least 75% of the amount stored at the beginning of the year? 261.1(c)(8)	___	___	_____

Amount at beginning of year	_____	X .75	_____
Plus			
Amount generated or received	_____		
Minus			
Amount remaining at end of year	_____		
Equals			
Amount recycled during year	_____	greater than or equal to above?	

If no, the facility was accumulating speculatively and all the RCRA H.W. provisions apply. 266.70(d)

Spent Lead-Acid Batteries Being Reclaimed
(Part 266 Subpart G)

	Yes	No	Comments
Does the facility store spent batteries that are recyclable materials before reclaiming them? 266.80(a)	___	___	_____
If yes, has the facility notified under RCRA 3010? 266.80(b)(1)	___	___	_____
Have they complied with Part 264 Subparts A-E, F-L (except for: waste analysis (264.13) and manifests (264.71-2))? 266.80(b)(2)	___	___	_____

"Boiler" means an enclosed device using controlled flame combustion and having the following characteristics:

(1)(i) The unit must have physical provisions for recovering and exporting thermal energy in the form of steam, heated fluids, or heated gases; and

(ii) The unit's combustion chamber and primary energy recovery sections(s) must be of integral design. To be of integral design, the combustion chamber and the primary energy recovery section(s) (such as waterwalls and superheaters) must be physically formed into one manufactured or assembled unit. A unit in which the combustion chamber and the primary energy recovery section(s) are joined only by ducts or connections carrying flue gas is not integrally designed; however, secondary energy recovery equipment (such as economizers or air preheaters) need not be physically formed into the same unit as the combustion chamber and the primary energy recovery section. The following units are not precluded from being boilers solely because they are not of integral design: process heaters (units that transfer energy directly to a process stream), and fluidized bed combustion units; and

(iii) While in operation, the unit must maintain a thermal energy recovery efficiency of at least 60 percent, calculated in terms of the recovered energy compared with the thermal value of the fuel; and

(iv) The unit must export and utilize at least 75 percent of the recovered energy, calculated on an annual basis. In this calculation, no credit shall be given for recovered heat used internally in the same unit. (Examples of internal use are the preheating of fuel or combustion air, and the driving of induced or forced draft fans or feedwater pumps); or

(2) The unit is one which the Regional Administrator has determined, on a case-by-case basis, to be a boiler, after considering the standards in § 260.32.

"Industrial furnace" means any of the following enclosed devices that are integral components of manufacturing processes and that use controlled flame devices to accomplish recovery of materials or energy:

(1) Cement kilns

(2) Lime kilns

(3) Aggregate kilns

(4) Phosphate kilns

(5) Coke ovens

(6) Blast furnaces

(7) Smelting, melting and refining furnaces (including pyrometallurgical devices such as cupolas, reverberator furnaces, sintering machine, roasters, and foundry furnaces)

(8) Titanium dioxide chloride process oxidation reactors

(9) Methane reforming furnaces

(10) Pulping liquor recovery furnaces

(11) Combustion devices used in the recovery of sulfur values from spent sulfuric acid

Land Disposal Restrictions
(Part 268)

	Yes	No	Comments
Did the facility handle any waste restricted from land disposal* since its effective prohibition date: 268.1(b) (See attached listings)			
F001 thru F005 spent solvents?	___	X	
F020-23 and F026-28 Dioxins?	___	X	
"California List" wastes?	___	X	
First Third scheduled wastes?	___	X	

Exemptions: Are the prohibited wastes exempted from land disposal restrictions because:

The waste is from conditionally-exempt small quantity generators? 268.1(c)(3)(all)	___	X	
A farmer is disposing of waste pesticides in accordance with 262.70? 268.1(c)(4)	___	X	
An "imminent endangerment" waiver has been granted under 121(d)(4) of CERCLA? 268.1(d)	___	X	

If no restricted wastes were handled after the effective dates or an above exemption applies to all restricted wastes handled, do not complete remainder of this section.

Exceptions: Can the restricted wastes continue to be land disposed because:

A case-by case extension has been granted under Subpart C or 268.5, for the wastes handled? 268.1(c)(1)(all), 268.30(d)(3)(F001-5), 268.31(d)(3)(dioxins), 268.32(g)(2)(CA list), 268.33(e)(3)(1st 3rd)	___	___	Not applicable
A no-migration petition has been granted under 268.6, for the wastes and units involved? (See 40 CFR 268.6(e-f) for operating requirements.) 268.1(c)(2)(all), 268.30(d)(2)(F001-5), 268.31(d)(2)(dioxins), 268.32(g)(1)(CA list), 268.33(e)(2)(1st 3rd)	___	___	
An exemption has been granted because the waste is certified treated by the best demonstrated available technology (BDAT)? 268.44(a)	___	___	

* Land disposal means placement in or on the land, including a landfill, surface impoundment, waste pile, land treatment facility, salt dome formation, underground mine or cave, injection well, or placement in a concrete vault or bunker for disposal. 268.2(a) Injection wells are being covered under a separate schedule.

	Yes	No	Comments
A generator certifies a good-faith effort in compliance with 268.8 "soft-hammer" regulations? 268.1(c)(5)	___	___	not applicable

If any of the preceding exceptions apply, the attached effective 268 Subpart C dates and concentrations, Subpart D standards, and Subpart E storage restrictions do not apply. Waste analysis and applicable generator certification requirements still pertain.

Has the handler not merely diluted the restricted waste or treatment residue in order to achieve compliance? 268.3	___	___	

Storage:

Are restricted wastes only being stored where: 268.50-

(a)(1) A generator is using tanks or containers while accumulating a sufficiently large batch to properly recover, treat, or dispose?	___	___	
(a)(2) A TSD is accumulating a batch as above? and:			
(i) Each container is marked with the contents and accumulation start date?	___	___	
(ii) Each tank is marked with the contents, accumulation start date, quantity of H.W., and/or the information is in the operating record?	___	___	
(c) The TSD can prove that any storage over one year was solely for the purpose of necessary accumulation? or:	___	___	
(d) The wastes are subject to an approved no-migration petition, case-by-case extension, a nation-wide variance, or a valid "soft hammer" 268.8 certification?	___	___	
(e) The stored wastes already meet any applicable treatment, concentration, or waiver standards?	___	___	
(f) After 7/8/87, are liquid hazardous wastes over 50 ppm PCBs stored for less than a year, and in a 761.65(b) (TSCA) complying storage area?	___	___	

See p. 268: 8 for off-site storage facility recordkeeping requirements.

	Yes	No	Comments
Generators: Waste Analysis			
If restricted wastes are generated on-site, has the generator, using knowledge or analysis, determined if the waste is restricted from land disposal? 268.7(a)	___	___	not applicable
Was the Paint Filter Liquids Test used to determine if waste sludges and solids were CA list liquids? 268.32(i)	___	___	
Did the generator determine if liquid CA list wastes have a pH of less than or equal to 2? 268.32(j)(1)	___	___	
Did the generator determine if liquid CA list wastes containing PCBs or HOCs were prohibited? 268.32(j)(2)	___	___	
Where waste treatment standards are expressed as concentrations in the waste extract (268.41), did any analysis include the TCLP (268 Appendix I)? 268.33(g)	___	___	
Notices, Certifications, and Demonstrations:			
If determined that the waste is restricted and requires treatment before land disposal, have they notified the treatment or storage facility with each shipment of waste? including: 268.7(a)(1)-	___	___	
(i) EPA H.W. number?	___	___	
(ii) Appropriate treatment standards and prohibitions?	___	___	
(iii) Manifest # for the waste?	___	___	
(iv) Available waste analysis data?	___	___	
If the waste is determined to be restricted but not require further treatment, has the generator submitted with each shipment to the treatment, storage or land disposal facility, a notice and a certification that the waste meets both treatment standards and applicable prohibitions? 268.7(a)(2)	___	___	
Did the notification include: 268.7(a)(2)(i)-			
(A) EPA H.W. number?	___	___	
(B) Appropriate treatment standards and prohibitions?	___	___	
(C) Manifest # for the waste?	___	___	
(D) Available waste analysis data?	___	___	

Land Disposal Restrictions - Continued
(Part 268)

	Yes	No	Comments
Was the following certification signed: 268.7(a)(2)(ii)	___	___	Not applicable

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

If the generator's waste is subject to a national variance, an extension or an exemption, have they notified the receiving facility with each shipment of waste that the waste is not prohibited from land disposal? 268.7(a)(3)	___	___	
Did the notice include: 268.7(a)(3)-			
(i) EPA H.W. number?	___	___	
(ii) Appropriate treatment standards and prohibitions?	___	___	
(iii) Manifest # for the waste?	___	___	
(iv) Available waste analysis data?	___	___	
(v) The date the waste is subject to prohibitions?	___	___	
If determined that the waste is a First Third waste without treatment standards and not a CA list waste (and thus a "soft hammer" waste), have they notified the receiving facility with each shipment? including: 268.7(a)(4)-	___	___	
(i) EPA H.W. number?	___	___	
(ii) Appropriate certifications and the restrictions under 268.33(f) for "soft hammer" wastes?	___	___	
(iii) Manifest # for the waste?	___	___	
(iv) Available waste analysis data?	___	___	
If determined that the waste is restricted based solely on knowledge, is all supporting data used in the determination maintained on-site in the generator's files? 268.7(a)(5)	___	___	
Has the generator retained on-site a copy of all notices, certifications, waste analysis data, and other Part 268 records for at least five years? 268.7(a)(6)	___	___	

NOTE: If the recipient of the generator's waste is not on the attached list (p. 11) of known land ban facilities, or if an off-site shipment without notification has occurred, indicate the accepting TSD facility on p. 11 for proper follow-up.

	Yes	No	Comments
Generators of First Third "soft hammer" wastes (268.33(f)) shipped for land disposal:			
Prior to shipment for land disposal, has the generator certified and submitted to the R.A. a demonstration of a good faith effort to locate and contract with treatment and recovery facilities for the practically available treatment which provides the greatest environmental benefit? 268.8(a)(1-2)			not applicable
Did the demonstration include a list of facilities and representatives contacted, complete with addresses, phone numbers, and contact dates? 268.8(a)(2)			
Was a copy of the demonstration submitted to the receiving facility with the first shipment of waste, and the certification with each shipment of waste? 268.8(a)(3) or -(4)			
Are copies of the demonstration and certification kept on site for at least five years? 268.8(a)(3) or -(4)			
If the generator determined there is no practical treatment for his waste, did the demonstration include a written discussion and the following certification? 268.8(a)(2)(i)			

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

If the generator determines that there are practical treatments for the waste, did they contract to use the technology that they demonstrated yields the greatest environmental benefits? 268.8(a)(2)(ii)			
Did they include the following certification? 268.8(a)(2)(ii)			

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology that yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Land Disposal Restrictions - Continued
(Part 268)

	Yes	No	Comments
Has the generator immediately notified the R.A. of any changes in the conditions on which the certification was based? 268.8(b)(1)	___	___	not applicable
If the R.A. invalidated a certification, has the generator immediately ceased shipments of the wastes, informed all facilities that received the waste, and retain records of the communication on-site in their files? 268.8(b)(3)	___	___	

	Yes	No	Comments
Treatment Facilities: Waste Analysis			
Has the facility tested their wastes as specified in their waste analysis plan (265.13)? 268.7(b)	___	___	not applicable
Where treatment standards are expressed as concentrations in the waste extract (268.41), has the facility tested the treatment residues or extract (using the TCLP, 268 Appendix I) to assure they met the applicable treatment standards? 268.7(b)(1)	___	___	
For CA list-only wastes, were the applicable 268.32 Paint Filter Liquids Test, pH test, HOCs, and PCB tests performed? 268.7(b)(2)	___	___	
For wastes with treatment standards expressed as concentrations in the waste (268.43), was the treatment residue, not an extract, tested? 268.7(b)(3)	___	___	
Notifications and certifications:			
Has the treater submitted with each shipment to the land disposal facility, a notice including: 268.7(b)(4)			
(i) EPA H.W. number?	___	___	
(ii) Corresponding treatment standard?	___	___	
(iii) Manifest # for the waste?	___	___	
(iv) Available waste analysis data?	___	___	
Has the treatment facility submitted a signed certification with each shipment of waste or treatment residue to the land disposal facility stating that the treatment standards in 268 Subpart D were met? 268.7(b)(5)	___	___	
For wastes with treatment standards listed as concentrations (268.41 or -.43) did the certification read: 268.7(b)(5)(i)	___	___	

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operations of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in 40 CFR Part 268 Subpart D without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

	Yes	No	Comments
For wastes with treatment standards listed as technologies (268.42) did the certification read: 268.7(b)(5)(ii)	___	___	Not applicable

I certify under penalty of law that waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Treatment and Off-site Storage facilities:

Where waste or treatment residues are sent off-site for further management, did the sender comply with the notification and certification requirements as the generator of the waste? 268.7(b)(6-7)	___	___	
Where First Third "soft hammer" wastes are treated or stored, has a copy of the generator's valid certification and demonstration been retained? 268.8(c) and:	___	___	
Has the treater or storer forwarded copies of the generator's certification and demonstration (if applicable) to the facility receiving the waste or treatment residues? 268.8(c)(2) and:	___	___	
Has the treatment or recovery facility certified as follows with each shipment of waste that he has treated the waste in accordance with the generator's demonstration? 268.8(c)(1)	___	___	

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operations of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with treatment as specified in the generator's demonstration. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

	Yes	No	Comments
Treatment in surface impoundments exemption:			
If wastes otherwise prohibited from land disposal are treated in surface impoundments, has the facility met the following conditions: 268.4(a)			
(1) Treated, not just stored, the wastes in the impoundment?	___	___	Not applicable
(2)(i) Analyzed all treatment residues (sludge and supernatant separately) to determine if they meet treatment and/or prohibition standards?	___	___	
(2)(ii) Removed annually all treatment residues (including liquids) that do not meet treatment or prohibition standards?*	___	___	
(2)(iii) Not placed the residues in another impoundment for subsequent management?*	___	___	
Has the facility certified that all impoundments used to treat restricted wastes meet design requirements (265.221(a)) and that the facility is in compliance with GW monitoring (265 Subpart F) requirements? 268.4(a)(3-4)	___	___	
Is there a principal means of treatment other than evaporation of H.W. constituents? 268.4(b)	___	___	
Does the waste analysis plan include the procedures and schedule for: 268.4(a)(2)(iv); 265.13(b)(7)-			
(i) Sampling the impoundment contents?	___	___	
(ii) The analysis of test data?	___	___	
(iii) The annual removal of residues which exhibit a H.W. characteristic, and:			
(A) Fail 268 Subpart D treatment standards? or:	___	___	
(B) Where no treatment standards have been established, such residues are prohibited from land disposal under:			
(1) 268.32 (CA list) or RCRA 3004(d)?	___	___	
(2) 268.33(f) (1st 3rd)?	___	___	

* Unless the wastes have a valid "good faith" certification under 268.8. If the annual flow through the impoundments is greater than the combined volume of the impoundments, the supernatant is considered removed.

Land Disposal Restrictions - Continued
(Part 268)

	Yes	No	Comments
Land Disposal Facilities:			
Does the facility have copies of all notices, certifications, and applicable demonstrations? 268.7(c)(1) (See also 265.73, Operating Record)	___	___	not applicable
Has the facility tested the waste, or an extract of the waste or treatment residue (using the TCLP, 268 Appendix I) to assure that the wastes or residues are in compliance with land disposal restrictions? 268.7(c)(2)	___	___	
Was the testing performed according to the frequency specified in the waste analysis plan? 268.7(c)(2)	___	___	
Where First Third "soft hammer" (268.33(f)) or CA waste liquid (268.32) wastes are disposed, did the facility: 268.7(c)(3), 268.8(d)			
Ensure the required certification (268.8) was received prior to disposal? and:	___	___	
That the disposal unit was in compliance with the "minimum technology" requirements of 40 CFR 268.5(h)(2)?	___	___	

Identified TSFs that treat LDR Waste:

AZD049318009	Buds Oil Service
AZD980816102	Environmental Waste Entpr
AZT050010230	Esco
AZD089308803	Safety Kleen
AZD980892897	Safety Kleen
AZD009015389	Southwest Solvents
AZD049314370	Rinchem Co Inc
CAT080010101	Appropriate Technologies
CAD074644659	Baron Blakeslee
CAT000618652	Baron-Blakeslee
CAT080014079	Bay Area Environmental
CAD028409019	Crosby & Overton
CAD000633115	IT Corp, San Jose Transfer
CAD008302903	Oil & Solvent Processing
CAD042245001	Omega Chemical
CAD029363876	Orange County Chemical Co
CAT080012651	Orange County Chemical Co
CAD095894556	Pacific Treatment Company
CAD008364432	Rho-Chem
CAD980737548	Roehl Corp
CAD009452657	Romic Chemical
CAD066113465	Safety Kleen
CAD077187888	Safety Kleen
CAD093459485	Safety Kleen
CAD980894562	Safety Kleen
CAT000613935	Safety Kleen
CAT000613919	Safety Kleen
CAD066177783	Safety Kleen
CAT000613893	Safety Kleen
CAT000613976	Safety Kleen
CAT000613992	Safety Kleen
CAT000613950	Safety Kleen
CAT000613927	Safety Kleen
CAD080916968	Safety Kleen
CAD980892475	Safety Kleen
CAT000613984	Safety Kleen
CAD053044053	Safety Kleen
CAD980817159	Safety Kleen
CAT000613943	Safety Kleen
CAT000613968	Safety Kleen
CAD059494310	Solvent Services
CAT080033681	Chem Tech Inc. (formerly Triple J Pacification)
NVD980895338	Eticam

ID#	Name/Address	Accepted w/o Certification?

RESTRICTED WASTES AND EFFECTIVE DATES:

Where wastes are in more than one catagory, the most restrictive standards apply.

Spent Solvents: (except injection wells)	Effective Date:
F001 through F005 spent solvent wastes that do not meet the Table CCWE 268.41 treatment standards (next page) and are not listed below	11/8/86
F001-F005 solvent wastes generated solely by small quantity generators of between 100-1000 kg/mo., or in total concentrations of less than 1% (see 268.30(a)(3-4)	11/8/88
F001-5 solvent wastes generated from a CERCLA response action or RCRA corrective action (non-soil or debris)	"
F001-F005 solvent wastes which are contaminated soil or debris generated from a CERCLA response action or RCRA corrective action under Subtitle C, where the disposal unit meets 268.5(h)(2) minimum technology requirements	8/8/90

Dioxin-Containing Wastes:	
F020, F021, F022, F023, F026, F027, F028 dioxin-containing wastes that do not meet the treatment standards (next page) and are not listed below	11/8/88
F020-23 and F026-28 dioxin-containing wastes which are contaminated soil or debris generated from a CERCLA response action or RCRA corrective action under Subtitle C, where the disposal unit meets 268.5(h)(2) minimum technology requirements	8/8/90

F001-F005 spent solvents. Treatment standards effective 11/8/86.	Treatment Standard (mg/l) Wastewaters	All Other Wastes*
Acetone	0.05	0.59
n-Butyl alcohol	5.00	5.00
Carbon disulfide	1.05	4.81
Carbon tetrachloride	0.05	0.96
Chlorobenzene	0.15	0.05
Cresols	2.82	0.75
Cresylic acid	2.82	0.75
Cyclohexanone	0.125	0.75
1,2-Dichlorobenzene	0.65	0.125
Ethyl acetate	0.05	0.75
Ethyl benzene	0.05	0.053
Ethyl ether	0.05	0.75
Isobutanol	5.00	5.00
Methanol	0.25	0.75
Methylene chloride	0.20	0.96
Methylene chloride from pharmaceutical industry	12.70 *	0.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichloroethane	1.05	0.96
1,1,2-Trifluroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

* The treatment standards in this treatability group are based on incineration.

F020, F021, F022, F023, F026, F027 or F028 dioxin containing wastes. These treatment standards become effective 11/8/88.	Treatment Standard
HxCDD-All Hexachlorodibenzo-p-dioxins	< 1 ppb
HxCDF-All Hexachlorodibenzofurans	< 1 ppb
PeCDD-All Pentachlorodibenzo-p-dioxins	< 1 ppb
PeCDF-All Pentachlorodibenzofurans	< 1 ppb
TCDD-All Tetrachlorodibenzo-p-dioxins	< 1 ppb
TCDF-All Tetrachlorodibenzofurans	< 1 ppb
2,4,5-Trichlorophenol	< 0.05 ppm
2,4,6-Trichlorophenol	< 0.05 ppm
2,3,4,6-Tetrachlorophenol	< 0.10 ppm
Pentachlorophenol	< 0.01 ppm

Note: Where a single constituent is addressed under more than one rulemaking, the applicable treatment standard or prohibition level is that for the more specific waste stream.

* Expired 8/17/88. 0.20 mg/l standard now applies.

"California List" wastes: (except in an injection well)

CA Waste Code	Restricted Waste:		Effective date:
711	Liquids with cyanides	≥ 1000 mg/l	7/8/87
721	" " arsenic	≥ 500 mg/l	"
722	" " cadmium	≥ 100 mg/l	"
723	" "chromium (VI)	≥ 500 mg/l	"
724	" " lead	≥ 500 mg/l	"
725	" " mercury	≥ 20 mg/l	"
726	" " nickel	≥ 134 mg/l	"
727	" " selenium	≥ 100 mg/l	"
728	" " thallium	≥ 130 mg/l	"
731	" " PCBs	≥ 50 mg/L	"

791 Liquid H.W. having a pH ≤ 2 — 7/8/87

741 Liquid H.W. that is primarily water and contain HOCs in total concentration ≥ 1,000 mg/l and less than 10,000 mg/l HOCs (listed on p.268: X) — "

751 H.W. having ≥ 1,000 ppm HOCs, that is not primarily water, and after 7/8/87 the disposal unit met 268.5(h)(2) minimum tech. requirements — 11/8/88

Contaminated soil or debris not resulting from a CERCLA response action or RCRA corrective action, and after 7/8/87 the disposal unit met 268.5(h)(2) requirements — 7/8/89

Contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action, and after 11/8/88 the disposal unit meets 268.5(h)(2) requirements — 11/8/90

Note: The prohibitions and effective dates above do not apply where a specified HOC is listed in 268 Subpart C (e.g. a H.W. chlorinated solvent under F001-5, or a 1st 3rd K086 solvent wash) 268.32(h)

First Third Wastes: (except in an injection well)	Effective Date:
First Third wastes, types, and concentrations listed in the following pages, and not detailed below	8/8/88
"Soft hammer" wastes with a valid demonstration and certificate	5/8/90
K048-52 and K061 wastes containing 15% zinc or greater, and after 8/8/88 are disposed of in a 268.5(h)(2) minimum tech. unit	8/8/90
Contaminated soils and debris with treatment standards based on incineration, and after 8/8/88 are disposed of in a 268.5(h)(2) minimum tech. unit	8/8/90
Various "soft hammer" wastewater residues with <1% TOC and <1% suspended solids: metals recovery or precipitation, cyanide destruction, carbon absorption, chemical oxidation, steam stripping, biodegradation, incineration or other direct thermal destruction. (268.12(b))	5/8/90
Leachate from the storage, disposal, or treatment of "soft hammer" wastes	5/8/90
First Third-only mixed radioactive/hazardous wastes	5/8/90

added to read as

c prohibitions—

8, 1988, the
CFR 261.32 as
e Nos. F006
1, K004
3
5, K016, K018,
wastewater), K022
1, K025, K030,
, K037, K044,
46
', K060

aining less than
aSO4, K069
3
6 (solvent
100, K101, K102,
hibited from land
injection well).
3, 1988 and
t 7, 1990, K061
zinc or greater
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s than 15% zinc.
3, 1990, the
CFR 261.32 as
Nos. K048, K049,
(containing 15%
071 are prohibited

1, 1990, the
CFR 268.10 having
Subpart D of
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d disposal.
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Subpart D of this

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3.6, with respect
ts covered by

(f) Between August 8, 1988, and May 8, 1990, the wastes specified in § 268.10 for which treatment standards under Subpart D of this Part are not applicable, including those wastes which are subject to the statutory prohibitions of RCRA section 3004(d) or codified prohibitions under § 268.32 of this Part, but not including wastes subject to a treatment standard under § 268.42 of this Part, are prohibited from disposal in a landfill or surface impoundment unless the wastes are the subject of a valid demonstration and certification pursuant to § 268.8.

(g) To determine whether a hazardous waste listed in § 268.10 exceeds the applicable treatment standards specified in § 268.41 and § 268.43, the initial generator must test a representative sample of the waste extract or the entire waste depending on whether the treatment standards are expressed as concentrations in the waste extract or the waste. If the waste contains constituents in excess of the applicable Subpart D levels, the waste is prohibited from land disposal and all requirements of Part 268 are applicable, except as otherwise specified.

Subpart D—Treatment Standards

13. Section 268.40 is amended by revising paragraph (a) and adding a new paragraph (c) to read as follows:

§ 268.40 Applicability of treatment standards.

(a) A restricted waste identified in § 268.41 may be land disposed only if an extract of the waste or of the treatment residue of the waste developed using the test method in Appendix I of this part does not exceed the value shown in Table CCWE of § 268.41 for any hazardous constituent listed in Table CCWE for that waste.

* * * * *

(c) A restricted waste identified in § 268.43 may be land disposed only if the constituent concentrations in the waste or treatment residue of the waste do not exceed the value shown in Table CCW of § 268.43 for any hazardous constituent listed in Table CCW for that waste.

14. In Table CCWE in § 268.41(a), in the column headed " F001–F005 spent solvents," "methylene chloride (from the pharmaceutical industry)" and its corresponding concentrations is deleted, and the following subtables to Table

(a) * * *

TABLE CCWE—CONSTITUTENT CONCENTRATIONS IN WASTE EXTRACT

* * * * *

F006 nonwastewaters (see also Table CCW in § 268.43)	Concentration (in mg/l)
Cadmium	0.066
Chromium (Total)	5.2
Lead	51
Nickel	.32
Silver	.072
Cyanides (Total)	Reserved

K001 nonwastewaters (see also Table in § 268.43)	Concentration (in mg/l)
Lead	0.51

K022 nonwastewaters (see also Table CCW in § 268.43)	Concentration (in mg/l)
Chromium (Total)	5.2
Nickel	0.32

K046 nonwastewaters (Nonreactive Subcategory)	Concentration (in mg/l)
Lead	0.18

K048, K049, K050, K051 and K052 nonwastewaters (see also Table CCW in § 268.43)	Concentration (in mg/l)
Arsenic	0.004
Chromium (Total)	1.7
Nickel	.048
Selenium	.025

K061 nonwastewaters (Low Zinc Subcategory—less than 15% total zinc)	Concentration (in mg/l)
Cadmium	0.14
Chromium (Total)	5.2
Lead	.24
Nickel	.32

K061 nonwastewaters (High Zinc Subcategory—15% or greater total zinc): effective until 8/8/90	Concentration (in mg/l)
Cadmium	0.14
Chromium (Total)	5.2
Lead	.24
Nickel	.32

K052 nonwastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Benzene	9.5
Benzo(a)pyrene	0.84
o-Cresol	2.2
p-Cresol	0.90
Ethylbenzene	67
Naphthalene	[Reserved]
Phenanthrene	7.7
Phenol	2.7
Toluene	9.5
Xylenes	[Reserved]
Cyanides (Total)	1.8

K052 wastewaters	Concentration (in mg/l)
Benzene	0.011
Benzo(a)pyrene	.047
o-Cresol	.011
p-Cresol	.011
2,4-Dimethylphenol	.033
Ethylbenzene	.011
Naphthalene	.033
Phenanthrene	.039
Phenol	.047
Toluene	.011
Xylenes	.011
Chromium (Total)	.20
Lead	.037

K062 wastewaters	Concentration (in mg/l)
Chromium (Total)	0.32
Lead	.04
Nickel	.44

K071 wastewaters	Concentration (in mg/l)
Mercury	0.030

K086 nonwastewaters—Solvent Washes Subcategory (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Acetone	0.37
bis(2-ethylhexyl) phthalate	.49
n-Butyl alcohol	.37
Cyclohexanone	.49
1,2-Dichlorobenzene	.49
Ethyl acetate	.37
Ethyl benzene	.031
Methanol	.37
Methylene chloride	.037
Methyl ethyl ketone	.37
Methyl isobutyl ketone	.37
Naphthalene	.49
Nitrobenzene	.49
Toluene	.031
1,1,1,-Trichloroethane	.044
Trichloroethylene	.031
Xylenes	.015

K086 wastewaters—Solvent Washes Subcategory	Concentration (in mg/l)
Acetone	0.015
bis(2-ethylhexyl)phthalate	.044
n-Butyl alcohol	.031
Cyclohexanone	.022
1,2-Dichlorobenzene	.044
Ethyl acetate	.031
Ethyl benzene	.015
Methanol	.031
Methylene chloride	.031
Methyl ethyl ketone	.031
Methyl isobutyl ketone	.031
Naphthalene	.044
Nitrobenzene	.044
Toluene	.029
1,1,1,-Trichloroethane	.031
Trichloroethylene	.029
Xylenes	.015
Chromium (Total)	.32
Lead	.037

K087 nonwastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Acenaphthalene	3.4
Benzene	.071
Chrysene	3.4
Fluoranthene	3.4
Indeno (1,2,3-cd) pyrene	3.4
Naphthalene	3.4
Phenanthrene	3.4
Toluene	.65
Xylenes	.070

K087 wastewaters	Concentration (in mg/l)
Acenaphthalene	0.028
Benzene	.014
Chrysene	.028
Fluoranthene	.028
Indeno (1,2,3-cd) pyrene	.028
Naphthalene	.028
Phenanthrene	.028
Toluene	.008
Xylenes	.014
Lead	.037

K099 nonwastewaters	Concentration (in mg/kg)
2,4-Dichlorophenoxyacetic acid	1.0
Hexachlorodibenzo-p-dioxins	.001
Hexachlorodibenzofurans	.001
Pentachlorodibenzo-p-dioxins	.001
Pentachlorodibenzofurans	.001
Tetrachlorodibenzo-p-dioxins	.001
Tetrachlorodibenzofurans	.001

K099 wastewaters	Concentration (in mg/l)
2,4-Dichlorophenoxyacetic acid	1.0
Hexachlorodibenzo-p-dioxins	.001
Hexachlorodibenzofurans	.001
Pentachlorodibenzo-p-dioxins	.001
Pentachlorodibenzofurans	.001
Tetrachlorodibenzo-p-dioxins	.001
Tetrachlorodibenzofurans	.001

K101 nonwastewaters (Low Arsenic Subcategory—less than 1% total arsenic) (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Ortho-Nitroaniline	14

K101 wastewaters	Concentration (in mg/l)
Ortho-Nitroaniline	0.27
Arsenic	2.0
Cadmium	.24
Lead	.11
Mercury	.027

K102 nonwastewaters (Low Arsenic Subcategory—less than 1% total arsenic) (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Ortho Nitrophenol	13

K102 wastewaters	Concentration (in mg/l)
Ortho-Nitrophenol	0.028
Arsenic	2.0
Cadmium	.24
Lead	.11
Mercury	.027

K103 nonwastewaters	Concentration (in mg/kg)
Aniline	5.6
Benzene	6.0
2,4-Dinitrophenol	5.6
Nitrobenzene	5.6
Phenol	5.6

K103 wastewaters	Concentration (in mg/l)
Aniline	4.5
Benzene	.15
2,4-Dinitrophenol	.61
Nitrobenzene	.073
Phenol	1.4

K104 nonwastewaters	Concentration (in mg/kg)
Aniline	5.6
Benzene	6.0
2,4-Dinitrophenol	5.6
Nitrobenzene	5.6
Phenol	5.6
Cyanides (Total)	1.8

K104 wastewaters	Concentration (in mg/l)
Aniline	4.5
Benzene	.15
2,4-Dinitrophenol	61

Concentration (in mg/kg)
14

Concentration (in mg/l)
0.27
2.0
.24
.11
.027

Concentration (in mg/kg)
13

Concentration (in mg/l)
0.028
2.0
.24
.11
.027

Concentration (in mg/kg)
5.6
6.0
5.6
5.6
5.6

Concentration (in mg/l)
4.5
.15
.61
.073
1.4

Concentration (in mg/kg)
5.6

K104 wastewaters	Concentration (in mg/l)
Nitrobenzene	.073
Phenol	1.4
Cyanides (Total)	2.7

No Land Disposal for:

K004 Nonwastewaters [Based on No Generation]
K008 Nonwastewaters [Based on No Generation]
K015 Nonwastewaters [Based on No Ash]
K021 Nonwastewaters [Based on No Generation]
K025 Nonwastewaters [Based on No Generation]
K036 Nonwastewaters [Based on No Generation]
K044 [Based on Reactivity]
K045 [Based on Reactivity]
K047 [Based on Reactivity]
K060 Nonwastewaters [Based on No Generation]
K061 Nonwastewaters—High Zinc Subcategory (greater than or equal to 15% total zinc) [Based on Recycling]: effective 8/8/90
K069 Nonwastewaters—Non-Calcium Sulfate Subcategory [Based on Recycling]
K083 Nonwastewaters—No Ash Subcategory (less than 0.01% total ash) [Based on No Ash]
K100 Nonwastewaters [Based on No Generation]

(b) When wastes with differing treatment standards for a constituent of concern are combined for purposes of treatment, the treatment residue must meet the lowest treatment standard for the constituent of concern.

17. In § 268.44, paragraphs (l) are added to read as follo

§ 268.44 Variance from a tre standard.

* * * * *

(h) Where the treatment s expressed as a concentratio or waste extract and a wast under conditions specific to site cannot be treated to the level, or where the treatmen is not appropriate to the wa generator or treatment facili apply to the Assistant Admi the Office of Solid Waste ar Emergency Response, or his representative, for a site-spe variance from a treatment s applicant for a site-specific must demonstrate that beca physical or chemical proper waste differs significantly fr waste analyzed in developi treatment standard, the was treated to specified levels o specified methods.

(i) Each application for a variance from a treatment s must include the informatio § 260.20(b)(1)–(4);

(j) After receiving an appl site-specific variance from a standard, the Assistant Adm or his delegated representat request any additional infor samples which may be requ evaluate the application.

(k) A generator, treatmen disposal facility that is man waste covered by a site-spe variance from a treatment s must comply with the waste requirements for restricted under § 268.7.

TABLE 1.—REGULATIONS IMPLEMENTING THE HAZARDOUS

Promulgation date	Title of regulation
• • • •	
[Insert date of promulgation of final rule in the Federal Register].	Land disposal restrictions for First T wastes.
• • • •	

Halogenated Organic Compounds Regulated Under § 268.32

In determining the concentration of HOCs in a hazardous waste for purposes of the § 268.32 land disposal prohibition, EPA has defined the HOCs that must be included in the calculation as any compounds having a carbon-halogen bond which are listed in this Appendix (see § 268.2). Appendix III to Part 268 consists of the following compounds:

Volatiles

Bromodichloromethane
Bromomethane
Carbon Tetrachloride
Chlorobenzene
2-Chloro-1,3-butadiene
Chlorodibromomethane
Chloroethane
2-Chloroethyl vinyl ether
Chloroform
Chloromethane
3-Chloropropene
1,2-Dibromo-3-chloropropane
1,2-Dibromomethane
Dibromomethane
Trans-1,4-Dichloro-2-butene
Dichlorodifluoromethane
1,1-Dichloroethane
1,2-Dichloroethane
1,1-Dichloroethylene
Trans-1,2-Dichloroethene
1,2-Dichloropropane
Trans-1,3-Dichloropropene
cis-1,3-Dichloropropene
Iodomethane
Methylene chloride
1,1,1,2-Tetrachloroethane
1,1,2,2-Tetrachloroethane
Tetrachloroethene
Tribromomethane
1,1,1-Trichloroethane
1,1,2-Trichloroethane
Trichloroethene
Trichloromonofluoromethane
1,2,3-Trichloropropane
Vinyl chloride

Semivolatiles

Bis(2-chloroethoxy)ethane
Bis(2-chloroethyl)ether
Bis(2-chloroisopropyl) ether
p-Chloroaniline
Chlorobenzilate
p-Chloro-m-cresol
2-Chloronaphthalene
2-Chlorophenol
3-Chloropropionitrile
m-Dichlorobenzene
o-Dichlorobenzene
p-Dichlorobenzene
3,3'-Dichlorobenzidine
2,4-Dichlorophenol
2,6-Dichlorophenol
Hexachlorobenzene
Hexachlorobutadiene
Hexachlorocyclopentadiene
Hexachloroethane
Hexachloroprophene
Hexachloropropene
4,4'-Methylenebis(2-chloroaniline)
Pentachlorobenzene
Pentachloroethane
Pentachloronitrobenzene
Pentachlorophenol
Pronamide
1,2,4,5-Tetrachlorobenzene
2,3,4,6-Tetrachlorophenol
1,2,4-Trichlorobenzene
2,4,5-Trichlorophenol
2,4,6-Trichlorophenol
Tris(2,3-dibromopropyl)phosphate

Organochlorine Pesticides

Aldrin
alpha-BHC
beta-BHC
delta-BHC
gamma-BHC
Chlordane
DDD
DDE
DDT
Dieldrin
Endosulfan I
Endosulfan II
Endrin
Endrin aldehyde
Heptachlor
Heptachlor epoxide
Isodrin
Kepone
Methoxyclor
Toxaphene

Phenoxyacetic Acid Herbicides

2,4-Dichlorophenoxyacetic acid
Silvex
2,4,5-T

PCBs

Aroclor 1016
Aroclor 1221
Aroclor 1232
Aroclor 1242
Aroclor 1248
Aroclor 1254
Aroclor 1260
PCBs not otherwise specified

Dioxins and Furans

Hexachlorodibenzo-p-dioxins
Hexachlorodibenzofuran
Pentachlorodibenzo-p-dioxins
Pentachlorodibenzofuran
Tetrachlorodibenzo-p-dioxins
Tetrachlorodibenzofuran
2,3,7,8-Tetrachlorodibenzo-p-dioxin

K062 nonwastewaters	Concentration (in mg/l)
Chromium (Total)	0.094
Lead	.37

K071 nonwastewaters	Concentration (in mg/l)
Mercury	0.025

K086 nonwastewaters (Solvent Washes Subcategory) see also Table CCW in § 268.43)	Concentration (in mg/l)
Chromium (Total)	0.094
Lead	.37

K087 nonwastewaters (see also Table CCW in § 268.43)	Concentration (in mg/l)
Lead	0.51

K101 and K102 nonwastewaters (Low Arsenic Subcategory—less than 1% Total Arsenic) (see also Table CCW in § 268.43)	Concentration (in mg/l)
Cadmium	0.066
Chromium (Total)	5.2
Lead	.51
Nickel	.32

15. In § 268.42 paragraph (a)(2) is revised to read as follows:

§ 268.42 Treatment standards expressed as specified technologies.

(a) * * *

(2) Nonliquid hazardous wastes containing halogenated organic compounds (HOCs) in total concentration greater than or equal to 1,000 mg/kg and liquid HOC-containing wastes that are prohibited under § 268.32(e)(1) of this part must be incinerated in accordance with the requirements of Part 264, Subpart O or Part 265, Subpart O, or in boilers or industrial furnaces burning in accordance with applicable regulatory standards. These treatment standards do not apply where the waste is subject to a Part 268, Subpart C treatment standard for a specific HOC (such as a hazardous waste chlorinated solventfor which a treatment standard is established under § 268.41(a)).

* * * * *

16. Section 268.43 is amended by adding paragraphs (a) and (b) and Table CCW to read as follows:

§ 268.43 Treatment standards expressed as waste concentrations.

(a) Table CCW identifies the restricted wastes and the concentrations of their associated hazardous constituents which may not be exceeded by the waste or treatment residual (not an extract of such waste or residual) for the allowable land disposal of such waste or residual.

TABLE CCW—CONSTITUENT CONCENTRATIONS IN WASTES

F001, F002, F003, F004 and F005 wastewaters (Pharmaceutical Industry)	Concentration (in mg/l)
Methylene chloride	0.44

F006 nonwastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Cyanides (Total)	Reserved

K001 nonwastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Naphthalene	8.0
Pentachlorophenol	37
Phenanthrene	8.0
Pyrene	7.3
Toluene	.14
Xylenes	.16

K001 wastewaters	Concentration (in mg/l)
Naphthalene	0.15
Pentachlorophenol	.99
Phenanthrene	.15
Pyrene	.14
Toluene	.14
Xylenes	.16
Lead	.037

K015 wastewaters	Concentration (in mg/l)
Anthracene	1.0
Benzal chloride	.28
Benzo (b and/or k) fluoranthene	.29
Phenanthrene	.27
Toluene	.15
Chromium (Total)	.32
Nickel	.44

K016 nonwastewaters	Concentration (in mg/kg)
Hexachlorobenzene	28
Hexachlorobutadiene	5.6
Hexachlorocyclopentadiene	5.6
Hexachloroethane	28
Tetrachloroethene	6.0

K016 wastewaters	Concentration (in mg/l)
Hexachlorobenzene	0.033
Hexachlorobutadiene	.007
Hexachlorocyclopentadiene	.007
Hexachloroethane	.033
Tetrachloroethene	.007

K018 nonwastewaters	Concentration (in mg/kg)
Chloroethane	6.0
1,1-Dichloroethane	6.0
1,2-Dichloroethane	6.0
Hexachlorobenzene	28
Hexachlorobutadiene	5.6
Hexachloroethane	28
Pentachloroethane	5.6
1,1,1-Trichloroethane	6.0

K018 wastewaters	Concentration (in mg/l)
Chloroethane	0.007
Chloromethane	.007
1,1-Dichloroethane	.007
1,2-Dichloroethane	.007
Hexachlorobenzene	.033
Hexachlorobutadiene	.007
Pentachloroethane	.007
1,1,1-Trichloroethane	.007

K019 nonwastewaters	Concentration (in mg/kg)
Bis(2-chloroethyl)ether	5.6
Chlorobenzene	6.0
Chloroform	6.0
1,2-Dichloroethane	6.0
Hexachloroethane	28
Naphthalene	5.6
Phenanthrene	5.6
Tetrachloroethene	6.0
1,2,4-Trichlorobenzene	19
1,1,1-Trichloroethane	6.0

K019 wastewaters	Concentration (in mg/l)
Bis(2-chloroethyl)ether	0.007
Chlorobenzene	.006
Chloroform	.007
p-Dichlorobenzene	.008
1,2-Dichloroethane	.007
Fluorene	.007
Hexachloroethane	.033
Naphthalene	.007
Phenanthrene	.007
1,2,4,5-Tetrachlorobenzene	.017
Tetrachloroethene	.007
1,2,4-Trichlorobenzene	.023
1,1,1-Trichloroethane	.007

K020 nonwastewaters	Concentration (in mg/kg)
1,2-Dichloroethane	6.0
1,1,2,2-Tetrachloroethane	5.6

K020 nonwastewaters	Concentration (in mg/kg)
Tetrachloroethene	6.0

K020 wastewaters	Concentration (in mg/l)
1,2-Dichloroethane	0.007
1,1,2,2-Tetrachloroethane	.007
Tetrachloroethene	.007

K022 nonwastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Acetophenone	19
Sum of Diphenylamine and Diphenylnitrosamine	13
Phenol	12
Toluene	0.034

K024 nonwastewaters	Concentration (in mg/kg)
Phthalic acid	28

K024 wastewaters	Concentration (in mg/l)
Phthalic acid	0.54

K030 nonwastewaters	Concentration (in mg/kg)
Hexachlorobutadiene	5.6
Hexachloroethane	28
Hexachloropropene	19
Pentachlorobenzene	28
Pentachloroethane	5.6
1,2,4,5-Tetrachlorobenzene	14
Tetrachloroethene	6.0
1,2,4-Trichlorobenzene	19

K030 wastewaters	Concentration (in mg/l)
o-Dichlorobenzene	0.008
p-Dichlorobenzene	.008
Hexachlorobutadiene	.007
Hexachloroethane	.033
Pentachloroethane	.007
1,2,4,5-Tetrachlorobenzene	.017
Tetrachloroethene	.007
1,2,4-Trichlorobenzene	.023

K037 nonwastewaters	Concentration (in mg/kg)
Disulfoton	0.1
Toluene	28

K037 wastewaters	Concentration (in mg/l)
Disulfoton	0.003
Toluene	.028

K048 nonwastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Benzene	9.5
Benzo(a)pyrene	.84
Bis(2-ethylhexyl)phthalate	37
Chrysene	2.2
Di-n-butyl phthalate	4.2
Ethylbenzene	67
Naphthalene	[Reserved]
Phenanthrene	7.7
Phenol	2.7
Pyrene	2.0
Toluene	9.5
Xylenes	[Reserved]
Cyanides (Total)	1.8

K048 wastewaters	Concentration (in mg/l)
Benzene	0.011
Benzo(a)pyrene	.047
Bis(2-ethylhexyl)phthalate	.043
Chrysene	.043
Di-n-butyl phthalate	.060
Ethylbenzene	.011
Fluorene	.050
Naphthalene	.033
Phenanthrene	.039
Phenol	.047
Pyrene	.045
Toluene	.011
Xylenes	.011
Chromium (Total)	.20
Lead	0.37

K049 nonwastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Anthracene	6.2
Benzene	9.5
Benzo(a)pyrene	0.84
Bis(2-ethylhexyl)phthalate	37
Chrysene	2.2
Ethylbenzene	67
Naphthalene	[Reserved]
Phenanthrene	7.7
Phenol	2.7
Pyrene	2.0
Toluene	9.5
Xylenes	[Reserved]
Cyanides (Total)	1.8

K049 wastewaters	Concentration (in mg/l)
Anthracene	0.039
Benzene	.011
Benzo(a)pyrene	.047
Bis(2-ethylhexyl)phthalate	.043
Carbon disulfide	.011
Chrysene	.043
2,4-Dimethylphenol	.033
Ethylbenzene	.011
Naphthalene	.033
Phenanthrene	.039

K049 wastewaters	Concentration (in mg/l)
Phenol	.047
Pyrene	.045
Toluene	.011
Xylenes	.011
Chromium (Total)	.20
Lead	.037

K050 nonwastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Benzo(a)pyrene	0.84
Phenol	2.7
Cyanides (Total)	1.8

K050 wastewaters	Concentration (in mg/l)
Benzo(a)pyrene	0.047
Phenol	.047
Chromium (Total)	.20
Lead	.037

K051 nonwastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Anthracene	6.2
Benzene	9.5
Benzo(a)anthracene	1.4
Benzo(a)pyrene	.84
Bis(2-ethylhexyl)phthalate	37
Chrysene	2.2
Di-n-butyl phthalate	4.2
Ethylbenzene	67
Naphthalene	[Reserved]
Phenanthrene	7.7
Phenol	2.7
Pyrene	2.0
Toluene	9.5
Xylenes	[Reserved]
Cyanides (Total)	1.8

K051 wastewaters	Concentration (in mg/l)
Acenaphthene	0.050
Anthracene	.039
Benzene	.011
Benzo(a)anthracene	.043
Benzo(a)pyrene	.047
Bis(2-ethylhexyl) phthalate	.043
Chrysene	.043
Di-n-butyl phthalate	.060
Ethylbenzene	.011
Fluorene	.050
Naphthalene	.033
Phenanthrene	.039
Phenol	.047
Pyrene	.045
Toluene	.011
Xylenes	.011
Chromium (Total)	.20
Lead	.037

Underground Storage Tanks:
(Part 280)

	Yes	No	Comments
Has an underground regulated substance* product storage tank been installed after 5/7/85?	___	___	_____
If yes, is the tank constructed so that it: 280.2(a)-			
(1) Will prevent releases due to corrosion or structural failure?	___	___	_____
(2) Is cathodically protected against corrosion, constructed of noncorrosive materials, or otherwise designed to prevent releases?	___	___	_____
(3) Is compatible with substances stored?	___	___	_____
If not constructed as above, have they demonstrated that soil resistivity is 12,000 ohm-cm or more? 280.2(b)	___	___	_____
By 5/8/86, did the facility notify the State or other required agency, using EPA Form 7530-1 (or in CA HSC04-070185), of tanks: 280.3-			
(a) Currently in use?	___	___	_____
(b) Taken out of operation after 1/1/74, but still in the ground?	___	___	_____
If the facility brought into use an undergound tank after 5/8/86, did they notify within 30 days? 280.3(c)	___	___	_____
Were separate notices submitted for tanks at each separate place of operation? 280.3(e)	___	___	_____
Were the notices complete? 280.3(f)	___	___	_____
Was the facility not required to notify because they previously submitted the information under §103(c) of CERCLA? 280.3(i)	___	___	_____

* 280.1 (a) Any substance defined in §101(14) of CERCLA but not a RCRA H.W.
(b) Petroleum, including crude, that is liquid at 60°F and 14.7 psi.

GENERATORS OF HAZARDOUS WASTE
CEI Checklist

SITE ID#: C A D 9 8 2 4 1 1 2 3 3

INSPECTION DATE: 11-29-89

SITE NAME: Capitol Drum

LOCATION: 749 Berry Street

Roseville (City) CA (State) 95678 (Zip)

LEAD INSPECTOR: Carolyn V. Jotoran Cain

OFFICE: Sacramento

TYPE OF INSPECTION: GENERATOR-ONLY X GENERATOR PORTION OF CEI ___

Other ___

INDEX FOR GENERATOR'S CHECKLIST

Page & Subpart — Content

262:
- 1: H.W. DETERMINATION
  RECYCLABLE MATERIALS
- 2: CONDITIONALLY-EXEMPT SMALL QUANTITY GENERATORS
- 3: GENERATORS - ALL not conditionally exempt
- 4: 100-1000 kg/month GENERATORS
- 6: GENERATOR REQUIREMENTS - MANIFESTS
- 7: CONTAINER LABELLING & ACCUMULATION
- ~~9: RECORDKEEPING AND REPORTING~~
- ~~E1: EXPORTS~~
- ~~F: IMPORTS~~
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~~265:~~
- "J": 100-1000 kg/month generators that ACCUMULATE H.W. IN TANKS

268: LAND DISPOSAL RESTRICTIONS

LINE OUT ITEMS NOT APPLICABLE TO THIS FACILITY

NOTES:

Facility Representatives:

Victor Kane
Steve Masto

Other Inspectors:

Keith Kihara
Linda Hennessy

Documents Copied or Requested:

Areas Present / Inspected:

Facility Recipient of Report: not applicable

Mailing Address (if different):

Generators - General:
(Part 262 Subpart A)

	Yes	No	Comments
Has the generator of solid wastes made a hazardous waste (H.W.) determination by determining if the waste is: 262.11-			facility does not generated RCRA Waste at this time
(a) Excluded from regulation under 261.4?	___	X	
(b) Listed as a H.W. in 261 Subpart D?	___	X	
(c) Exhibits a characteristic identified in 261 Subpart C by either:			
(1) Testing the waste?	___	X	
(2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used?	___	X	
(d) Excluded or restricted under 264, 265, or 268, if determined hazardous?	___	X	

Note: See Part 268 checklist for Land Ban restricted wastes generator requirements.

Recyclable Materials

If the wastes are any of the following recyclable materials, also complete Parts 270 (permits and notifications), and Part 266 Subparts A-G of the TSD checklists: 261.6(a)(2)-			Not applicable
(i) Those used in a manner constituting disposal (Subpart C)?	___	___	
(ii) H.W.s burned for energy recovery in boilers and industrial furnaces not regulated as an incinerator (Subpart D)?	___	___	
(iii) H.W. characteristic used oil that is burned as above (Subpart E)?	___	___	
(iv) Those from which precious metals are reclaimed (Subpart F)?	___	___	
(v) Spent lead-acid batteries that are reclaimed (Subpart G)?	___	___	

Note: The following recyclable materials are exempt from EPA RCRA regulation: 261.6(a)(3)-
(i) Industrial ethyl alcohol that is reclaimed (unless provided otherwise in an international agreement).
(ii) Used batteries or cells returned to the manufacturer for regeneration.
(iii) Used oil not burned for energy recovery.
(iv) Scrap metal.
(v-ix) Specified steel (K087) and petroleum refinery production wastes.

Conditionally Exempt Small Quantity Generators
(Part 261)

	Yes	No	Comments
Does the facility qualify as a conditionally exempt small quantity generator each calendar month by:			
Generating less than 100 kgs, and acumulating less than 1000 kgs ot H.W. on site? 261.5(a),(g) or:			not applicable
Generating and accumulating less than 1 kg of acute H.W., or 100 kgs of acute H.W. contaminated soil or spill residues? 261.5(e)(1-2)			
If no, proceed to next page.			
Did the quantity determination include all listed and characteristic wastes generated except: 261.5(d)-			
(1) H.W. removed from on-site storage?			
(2) H.W. produced by on-site treatment or reclamation of H.W. that was already counted once?			
(3) Spent materials that have already been counted once and that are reclaimed and subsequently reused on site? or:			
H.W. exempted from regulation? 261.5(c)			
Has the conditionally exempt small quantity generator treated or disposed of the H.W. in an on-site facility, or ensured delivery to an off-site U.S. TSD, which is any of the following?: 261.5(f,g)(3)-			
(i) Permitted under Part 270?			
(ii) In interim status under 265 and 270?			
(iii) Authorized by an approved state under Part 271?			
(iv) Permitted, licensed, or registered by a state to manage municipal or industrial solid waste?			
(v) A facility which: (A) Legitimately uses, reuses, recycles, or reclaims the waste?			
(B) Treats its waste prior to use, reuse, recycling, or reclaiming?			

Generators (all except Conditionally Exempt)
(Part 262)

	Yes	No	Comments
Has the generator submitted a Notification of Hazardous Waste Activity (EPA Form 8700-12) and obtained an EPA ID number before handling H.W.? 262.12(a)	___	___	Not applicable
Have they offered H.W. only to transporters or TSDs with an EPA ID#? 262.12(c)	___	___	
Generation Points			
The generator may accumulate H.W. at or near the point of initial generation without meeting storage deadlines provided: 262.34(c)(1)			
They accumulate no more than 55 gallons of H.W. or one quart of acute H.W.? and:	___	___	
The area is under the control of the operator of the process generating the waste? and:	___	___	
(i) The container is in good condition, compatible with the waste, and kept closed (except when H.W. is being removed or added)?	___	___	
(ii) The container is marked with the words "Hazardous Waste" or other words that identify the contents?	___	___	
When H.W. accumulates in excess of the above amounts, does the generator: 262.34(c)(2)			
Continue to comply with the storage requirements above? and:	___	___	
Mark the container holding the excess with the date the excess amount of H.W. began accumulating? and:	___	___	
Comply with all 90-day storage requirements (262.34(a)) within three days?	___	___	
100-1000 kgs/mo. Generator Qualifications			
Does the facility generate between 100 and 1000 kilograms of non-acute * H.W. per month, and never accumulate more than 6000 kilograms of H.W. on site?	___	___	

If yes, go to next page.
If no, go to fully regulated generators, p. 6.

* Generators of more than 1 kg/mo., or who accumulate more than 1 kg at any time, of acute H.W. (listed in 261.33(e)) are fully-regulated generators. (261.5(f)(2), revised 7/19/88).

Generators of Between 100 and 1,000 kg/month
(Part 262)

	Yes	No	Comments
Has the 100-1000 kg/mo. generator accumulated H.W. on site for no more than 180 days* without a permit or interim status? 262.34(d)	___	___	not applicable
Have they accumulated less than 6000 kgs of H.W. on site at any time? 262.34(d)(1)	___	___	
If the generator exceeded the applicable storage time or quantity limit without an EPA extension, did they comply with all TSD storage facility regulations? 262.34(f)	___	___	
Did the 100-1000 kg/mo. generator that treats, stores, or disposes of H.W. on-site submit a Part A application by 3/24/87? 270.10(e)(iii)	___	___	
While accumulating waste, has the 100-1000 kg/mo. generator complied with the requirements for storage in containers, 265 Subpart I (except for the 50 foot rule (265.176))? 262.34(d)(2)	___	___	
Have they complied with 265.201, storage in tanks (attached)? 262.34(d)(3)	___	___	
Has the 100-1000 kg/mo. generator complied with the requirements for: 262.34(d)(4)			
265 Subpart C, preparedness and prevention? and:	___	___	
Clearly marked the date accumulation started on each container? and:	___	___	
Labelled each container and tank with the words "Hazardous Waste"?	___	___	
Does the generator have an emergency coordinator (E.C.) on site or immediately available at all times? 262.34(d)(5)(i)	___	___	
Is the following information posted next to the telephone: 262.34(d)(5)(ii)-			
(A) E.C.'s name and phone number?	___	___	
(B) Location of fire extinguishers, spill control material, and any fire alarms?	___	___	
(C) If no direct alarms, the phone number of the fire department?	___	___	

** 270 days if they must transport more than 200 miles to TSD facility. 262.34(e)

Generators of Between 100 and 1,000 kg/month
(Part 262)

	Yes	No	Comments
Are all employees are familiar with their jobs' proper waste handling and emergency procedures? 262.34(d)(5)(iii)	___	___	Not applicable
If an emergency has occurred, has the emergency coordinator: 262.34(d)(5)(iv)-			
(A) Tried to extinguish the fire, or called the fire department?	___	___	
(B) In the event of a spill, contained the flow of H.W., and cleaned up as soon as possible?	___	___	
(C) Determined if the emergency is threatening human health or surface water outside the facility, and if so called the National Response Center at (800)424-8802 and reported:			
(1) The generator's name, address, and EPA ID #?	___	___	
(2) Date, time, and type of incident?	___	___	
(3) Quantity and type of H.W. involved?	___	___	
(4) Extent of any injuries?	___	___	
(5) Estimated quantity and disposition of any recovered materials?	___	___	
Did the generator keep copies of signed manifests, waste analysis, test results, or H.W. determinations for three years after the waste was last sent for on- or off-site treatment, storage, or disposal? 262.44(a)	___	___	
Is the 100-1000 kg/mo. generator's H.W. reclaimed under a contractual agreement? 262.20(e)- If yes:	___	___	
(1)(i) Does the waste reclamation contract specify the type of waste and frequency of shipments?	___	___	
(ii) Is the transport vehicle owned and operated by the recycler/reclaimer?	___	___	
(2) Did the generator keep a copy of the contractual agreement for three years after the agreement ended?	___	___	

If not reclaimed under contract, complete below and Manifests (next page).

Did the 100-1000 kg/mo. generator who has not received a signed copy of the manifest from the TSD within 60 days submit a copy of the manifest to the R.A. with a note indicating they have not received confirmation of delivery? 262.42(b), 262.44(b)	___	___	

Generators:
(Part 262)

	Yes	No	Comments
Manifests: 262.20-			
(a) Does the generator prepare a complete manifest according to the instructions (see Part 262 Appendix) before transporting H.W. off-site?	___	___	not applicable
(b) Does the generator designate on the manifest one facility which is permitted to handle the H.W.?	___	___	
(c) Has the facility designated an emergency alternate facility? or:	___	___	
(d) Instructed the transporter to return the waste to the generator in the event an emergency prevents delivery?	___	___	
Did the generator use the supplied manifest required by a consignment State: 262.21-			
(a) Where the receiving facility is? or, if not provided by that State:	___	___	
(b) Where the generating facility is?	___	___	
(c) If not provided by either State, the EPA form from another source?	___	___	
Did the manifest consist of enough copies? 262.22	___	___	
Did the generator: 262.23(a)			
(1) Sign the manifest by hand?	___	___	
(2) Obtain the signature of initial transporter and date of acceptance on manifest?	___	___	
(3) Keep one copy of the manifest (per 262.40(a))?	___	___	
Did the generator give the remaining copies of the manifest to the transporter? 262.23(b)	___	___	
If the shipment was sent by water or rail, was 262.23 complied with?	___	___	

Pre-Transport Requirements:
(262 Subpart C)

	Yes	No	Comments
Is waste packaged in accordance with DOT packaging regulations (49 CFR 173, 178-9)? 262.30	___	___	Not applicable
Are waste packages labeled in accordance with DOT regulations (40 CFR 172.101)? 262.31	___	___	
Are containers marked in accordance with DOT regulations (49 CFR 172.101)? 262.32(a) including:	___	___	
Proper shipping name [table column 2]?	___	___	
Proper ID number [table column 3A]?	___	___	
Proper ORM designation for containers of ORM-A,B,C,D or E wastes?	___	___	
Are containers of 110 gallons or less marked with the following words? 262.32(b) HAZARDOUS WASTE-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency. Generators Name & Address _____ Manifest Document Number _____	___	___	
Does the generator placard or offer the initial transporter the appropriate placards (49 CFR 172 Subpart F)? 262.33	___	___	

90-Day Storage

If the generator does not have interim status (as a TSD storage facility), have they accumulated H.W. on-site for less than 90 days? 262.34(a)	___	___	
Are containers visibly marked with the date accumulation started? 262.34(a)(2)	___	___	
Is each container or tank clearly marked with the words "Hazardous Waste"? 262.34(a)(3)	___	___	

IV. Pre-Transport Requirements: (Part 262 Subpart C)

	Yes	No	Comments
Does the generator comply with the requirements of 40 CFR Part 265: 262.34(a)(1), -(4) (see TSD checklists)			
Subpart I for the use and management of containers?	___	___	Not applicable
Subpart J for tanks (except 265.197(c), closure of tanks without secondary containment, and 265.200)?	___	___	
265.111 for tank closure performance standards?	___	___	
265.114 for tank decontamination after closure?	___	___	
Subpart C for preparedness and prevention?	___	___	
Subpart D for contingency plan and emergency procedures?	___	___	
265.16 for personnel training?	___	___	
If the generator has stored H.W. on-site for more than 90 days*, have they: 262.34(b)			
Been granted an extension from the EPA? or:	___	___	
Complied with the 40 CFR Parts 264 and 265 and the permitting requirements in Part 270 of RCRA?	___	___	

* Except at the point of initial generation in compliance with 262.34(c). (see p. 3.)

Recordkeeping and Reporting:
(Part 262 Subpart D)

	Yes	No	Comments
Are the following kept for at least three years: 262.40-			
(a) Manifest signed by the receiving facility?	___	___	_____
(b) Biennial Reports and Exception Reports?	___	___	_____
(c) Test results, waste analysis or other determinations made in accordance with 262.11?	___	___	_____
Biennial Report:			
If the facility has shipped any waste off-site to a U.S. TSD, have they submitted a Biennial Report to the RA by March 1 of each even numbered year? 262.41(a)	___	___	_____
Was the report submitted on EPA Form 8700-13A and cover generator activities during the previous calendar year? 262.41(a)	___	___	_____
Does the report include the following information: 262.41(a)-			
(1) EPA ID No., name and address of the generator?	___	___	_____
(2) Calendar year covered by the report?	___	___	_____
(3) The EPA ID No., name, and address for each off-site U.S. TSD to which H.W. was shipped during the year?	___	___	_____
(4) Name and EPA ID No. of each transporter used during the year to ship to a U.S. TSD?	___	___	_____
(5) Description, EPA hazardous waste No., DOT hazard class and quantity of each H.W. shipped off-site to a U.S. TSD?	___	___	_____
Was this information listed by EPA ID No. of each off-site U.S. TSD to which H.W. was shipped?	___	___	_____

Recordkeeping and Reporting: - Continued
(Part 262 Subpart D)

	Yes	No	Comments
(6) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated?	___	___	_____
(7) A description of the changes in volume and toxicity actually achieved during the year in comparison to previous years (back to 1984 if available)?	___	___	_____
(8) The signed certification?	___	___	_____
Exception Reporting: 262.42(a)-			
(1) For a generator of more than 1000 kg/mo. that has not received a signed copy of the manifest from the designated facility within 35 days, has the generator determined the status of the H.W.?	___	___	_____
(2) For a generator that has not received a signed copy of the manifest within 45 days, has the generator submitted an Exception Report to the RA?	___	___	_____
Did the Exception Report include: 262.42(a)-			
(i) A legible copy of the manifest?	___	___	_____
(ii) A signed cover letter explaining the efforts taken to locate the H.W. and the results of those efforts?	___	___	_____

Exports of Hazardous Waste:
(Part 262 Subpart E)

	Yes	No	Comments
Exports of H.W. are prohibited unless: 262.52-			
(a) Notification (262.53) has been provided?	___	___	_____
(b) The receiving country has consented to accept the waste?	___	___	_____
(c) A copy of the EPA Acknowledgment of Consent accompanies the shipment, and is attached to the the manifest or shipping paper?	___	___	_____
(d) The H.W. shipment conforms to the receiving country's written terms in the EPA Acknowledgment of Consent?	___	___	_____
Did the primary exporter of H.W. notify the EPA each calendar year of intended exports? 262.53(a)	___	___	_____
Was the notification at least 60 days before the intended date of the initial off-site shipment for the calendar year? 262.53(a)	___	___	_____
Did the notice signed by the primary exporter include his name and address and the following information, by consignee, for each H.W. type: 262.53(a)(1), (2)-			
(i) A description of the H.W., the EPA waste identification no. and the DOT shipping description (40 CFR 171-177)?	___	___	_____
(ii) The estimated frequency and time span of exportation?	___	___	_____
(iii) The estimated total quantity?	___	___	_____
(iv) All points of entry to and departure from each foreign country the H.W. will pass through?	___	___	_____
(v) How the waste will be transported (types of vehicles and containers)?	___	___	_____
(vi) A description of how the waste will be treated, stored, or disposed of in the receiving country?	___	___	_____
(vii) The name and site address of the foreign consignee(s)?	___	___	_____
(viii) The name of each country the H.W. will pass through, for how long it will remain there, and how it will be handled during that time?	___	___	_____

Exports of Hazardous Waste: Continued
(Part 262 Subpart E)

	Yes	No	Comments
Was the export notification marked "Attention: Notification to Export" and sent to: Office of International Activities (A-106) EPA, 401 M St. SW., Washington DC 20460? 262.53(b)	___	___	_____
Has the primary exporter not shipped waste until the notification was correct and an EPA Acknowledgment of Consent was received? 262.53(c)	___	___	_____
Does the exporter meet the requirements for use of the manifest, except that: 262.54-			
(a-b) The name and address of the foreign consignees are substituted for the name, address and EPA ID No. of the designated facilities?	___	___	_____
(c) The generator identifies the point of departure from the U.S. under Special Handling Instructions and Additional Information?	___	___	_____
(d) The phrase "and conforms to the terms of the attached EPA Acknowledgment of Consent" is added to the end of the first sentence in the certification?	___	___	_____
(e) The primary exporter's appropriate State manifest is used where required?	___	___	_____
(f) The primary exporter requires that the consignee confirm delivery of H.W. in the foreign country (e.g., manifest signed by foreign consignee and returned to generator)?	___	___	_____
If the shipment could not be delivered to the consignees, did the primary exporter: 262.54(g)-			
(1) Renotify the EPA, request approval of shipment to a new consignee, and obtain a new EPA Acknowledgement of Consent prior to delivery? or:	___	___	_____
(2) Instruct the transporter to return the shipment to the U.S.? and:	___	___	_____
(3) Instruct the transporter to revise the manifest accordingly?	___	___	_____

Exports of Hazardous Waste: Continued
(Part 262 Subpart E)

	Yes	No	Comments
(h) A copy of the EPA Acknowledgment of Consent accompanies the shipment, and is attached to the manifest or shipping paper?	___	___	_____
(i) The primary exporter provides an extra manifest copy for the transporter to give to U.S. Customs?	___	___	_____
Did the primary exporter file an Exception Report if: 262.55-			
(a) A signed copy of the manifest from the transporter stating date and place of departure from U.S. had not been received in 45 days?	___	___	_____
(b) A written confirmation from the foreign consignee had not been received within 90 days?	___	___	_____
(c) The waste was returned to the U.S.?	___	___	_____
Has the facility submitted an Annual Report to the RA by March 1 of each year, summarizing the types, frequency, quantity, and ultimate destination of all H.W. exported during the previous calendar year? 262.56(a)	___	___	_____
Did the report include the following information: 262.56(a)-			
(1) EPA ID No., name, mailing and site and address of the exporter?	___	___	_____
(2) Calendar year covered by the report?	___	___	_____
(3) The name and site address of each consignee?	___	___	_____
(4) Description, EPA hazardous waste No., DOT hazard class and quantity of each H.W. shipped to each consignee, the name and ID No. of each transporter, the total amount of waste shipped and the number of shipments pursuant to each notification?	___	___	_____

Exports of Hazardous Waste: Continued
(Part 262 Subpart E)

	Yes	No	Comments
(5) Except for 100-1000 kg/mo. generators, each even numbered year:			
(i) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated? and:	___	___	_____
(ii) A description of the changes in volume and toxicity actually achieved during the year in comparison to previous years (prior to 1984 if available)?	___	___	_____
(6) A signed certification which states:	___	___	_____

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information. I believe that the submitted information is true. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Was the annual report sent to: Office of International Activities (A-106), EPA, 401 M Street SW., Washington DC 20460?	___	___	_____
Did the primary exporter keep for at least three years a copy of each: 262.57(a)-			
(1) Notification of intent to export (from the date the H.W. was accepted)?	___	___	_____
(2) EPA Acknowledgment of Consent (from the date the H.W. was accepted by the initial transporter)?	___	___	_____
(3) Confirmation of delivery (from the date the H.W. was accepted by the initial transporter)?			
(4) Annual report (from the due date)?	___	___	_____

Imports of Hazardous Waste
(Part 262 Subpart F)

	Yes	No	Comments
Does the facility import H.W. from a foreign country into the U.S.? 262.60(a)	___	___	_____
When importing H.W., do they comply with all manifest requirements except that: 262.60(b)-			
(1) The name, address, and EPA ID No. of the importer is used instead of the generator?	___	___	_____
(2) The U.S. importer or his agent signs and dates the certification and obtains the signature of the initial transporter?	___	___	_____
Did the importer use the manifest supplied and required by the consignment State? 262.60(c)	___	___	_____

Farmers
(Part 262 Subpart G)

	Yes	No	Comments
A farmer disposing of waste pesticides is not required to comply with Part 262 generator standards or Parts 270, 264, 265, 268, or 270 for those wastes provided: 262.70			
The pesticides are from their own use?	___	___	_____
They triple-rinses each pesticide container in accordance with 261.7(b)(3)?	___	___	_____
Dispose of the residues on their own farm in a manner consistent with the disposal instructions on the pesticide label?	___	___	_____

Generators of Between 100 and 1,000 kg/month That Accumulate H.W. in Tanks
(Part 265 Subpart J)

	Yes	No	Comments
For H.W. generators of between 100-1000 kg/mo. that accumulate in tanks for less than 180 days*, and do not accumulate over 6000 kg on-site at any time: 265.201(b)-			
(1) Does treatment or storage of H.W. in tanks comply with 265.17(b)?	___	___	_____
(2) Are H.W. or treatment reagents not placed in a tank if they could cause the tank or inner liner to fail?	___	___	_____
(3) Do uncovered tanks have at least 2 feet (60 centimeters) of freeboard, or overflow containment capacity equal to the volume of the top 2 feet?	___	___	_____
(4) Where H.W. is continuously fed into a tank, is there a means to stop inflow?	___	___	_____
Does the 100-1000 kg/mo. generator inspect: 265.201(c)-			
(1) Discharge control equipment (waste feed cut-off and by-pass systems, drainage systems) daily?	___	___	_____
(2) Data from monitoring equipment (pressure and temperature gauges) daily?	___	___	_____
(3) Waste levels in tanks daily?	___	___	_____
(4) Tank construction materials for corrosion or leaking fixtures and seams weekly?	___	___	_____
(5) Construction materials and area surrounding the tank, including secondary containment (dikes) for erosion or signs of releases (wet spots, dead vegetation) weekly?	___	___	_____

* Or 270 days if they must ship the waste over 200 miles.

Generators of Between 100 and 1,000 kg/month That Accumulate H.W. in Tanks
(Part 265 Subpart J)

	Yes	No	Comments
Are ignitable or reactive waste not placed in a tank, unless: 265.201(e)(1)-			
(i) The waste is treated, rendered, or mixed before or immediately after placement in a tank so that the resulting waste no longer meets the definition of ignitability or reactivity? or:	___	___	_____
(ii) The waste is stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react? or:	___	___	_____
(iii) The tank is used solely for emergencies?	___	___	_____
Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981)? 265.201(e)(2)	___	___	_____
Unless 265.17(b) is complied with: 265.201(f)-			
(1) Are incompatible wastes stored in separate tanks?	___	___	_____
(2) Is H.W. not placed in unwashed tanks that previously held an incompatible waste or material?	___	___	_____

TRANSPORTERS OF HAZARDOUS WASTE
CEI Checklist

SITE ID#: __ __ __ __ __ __ __ __ __ __ __ __ __ INSPECTION DATE: _____

SITE NAME: _____

LOCATION: _____

_____ __ __ __ __ __ __ __ __ __
City State Zip

LEAD INSPECTOR: _____ OFFICE: _____

TYPE OF INSPECTION: TRANSPORTER-ONLY ____ TRANSPORTER PORTION OF CEI ___

Other_____

INDEX FOR TRANSPORTER'S CHECKLIST

Line out items not applicable to this facility.

Transporters of Hazardous Waste:
(Part 263)

Revised 8/88

	Yes	No	Comments
Is the transportation of H.W. within the U.S., and does it require a manifest under Part 262? 263.10(a) If no, this Subpart does not apply.	___	___	_____
Is a generator or permitted H.W. management facility only transporting H.W. on-site? 263.10(b) If yes, this Subpart does not apply.	___	___	_____
Does the transporter ship H.W. into the U.S. from abroad? 263.10(c)(1) or:	___	___	_____
Does the transporter mix H.W. of different DOT shipping descriptions by placing them into a single container? 263.10(c)(2)	___	___	_____
If Yes, then the transporter is also a generator and must comply with the Part 262.			
Has the transporter received an EPA I.D. Number* before transporting H.W.? 263.11(a)	___	___	_____
Does the transporter store manifested H.W. at a transfer facility for more than 10 days? 263.12	___	___	_____
If yes, the transporter is a RCRA TSD facility.			
Compliance with the manifest:			
Did the transporter deliver the entire quantity of H.W. he accepted to: 263.21(a)-			
(1) The designated facility listed on the manifest? or:	___	___	_____
(2) An alternate designated facility if waste cannot be delivered to designated facility because an emergency prevents delivery? or:	___	___	_____

* A government official may authorize a transporter to remove waste without an ID # or manifests during emergency spill clean-ups. 263.30(b)

Transporters:
(Part 263 Subpart B)

	Yes	No	Comments
If the waste could not be delivered, did the transporter contact the generator for further instructions and revise the manifest according to those instructions? 263.21(b)	___	___	_____
If transported by water (bulk shipments), see page 4. If transported by rail, see page 5.			
Is the transporter handling H.W. from a 100-1000 kg/mo. generator according to a reclamation agreement (262.20(e)?	___	___	_____
If no, go to The manifest system, below.			
If yes, the H.W. handled is from a 100-1000 kg/mo. generator under a reclamation agreement, did the transporter record on a log or shipping paper for each shipment: 263.20(h)(1),(2)-			
(i) The name, address, and ID No. of the generator?	___	___	_____
(ii) The quantity of the waste accepted?	___	___	_____
(iii) All DOT-req. shipping information?	___	___	_____
(iv) The date the waste is accepted?	___	___	_____
Did the transporter carry this information during the transport? 263.20(h)(3)	___	___	_____
Did the transporter retain copies of the records for at least three years after termination or expiration of the agreement? 263.20(h)(4)	___	___	_____
Go to H.W. discharges, next page.			
The manifest system:			
Does the transporter comply with the following manifest requirements:			
Accepts H.W. only with a manifest properly signed by the generator? 263.20(a)	___	___	_____
Does not accept from a primary exporter H.W. bound for outside the U.S. unless: 263.20(a)-			
(1) He knows the shipment conforms to the EPA Acknowledgment of Consent? and:	___	___	_____

Transporters:
(Part 263 Subpart B, C)

	Yes	No	Comments
(2) Unless the EPA Acknowledgment of Consent is attached to the manifest or shipping papers?	___	___	_____
Before transporting H.W., signs, dates, and leaves a copy of the manifest for the generator? 263.20(b)	___	___	_____
Transports the H.W. with the manifest (and any Acknowledgment of Consent)? 263.20(c)	___	___	_____
At delivery to the designated facility or another transporter, did the transporter: 263.20(d)-			
(1) Obtain the date of delivery and signature from the next transporter or the designated facility?	___	___	_____
(2) Retain one copy of the manifest?	___	___	_____
(3) Give the remaining copies of the manifest to the accepting transporter or designated facility?	___	___	_____
Did the transporter who transported H.W. out of the U.S.: 263.20(g)-			
(1) Indicate on the manifest the date the H.W. left the U.S.?	___	___	_____
(2) Sign the manifest and retain one copy?	___	___	_____
(3) Return a signed copy to the generator?	___	___	_____
(4) Give one copy of the manifest to the U.S. Customs official at the point of departure from the U.S.?	___	___	_____
Recordkeeping:			
Does the transporter keep a copy of the manifest signed by the generator, himself, and the next transporter or designated facility for 3 years after accepting the shipment? 263.22(a)	___	___	_____
Did the transporter who transported H.W. out of the U.S. keep a copy of the manifest (indicating that the H.W. left the country) for three years? 263.22(d)	___	___	_____

Transporters:
(Part 263 Subpart B, C)

	Yes	No	Comments
Hazardous waste discharges:			
In the event of a discharge of H.W. during transportation, did the transporter take appropriate immediate action to protect human health and the environment (e.g., notify local authorities, dike the discharge area)? 263.30(a)	___	___	_____
Did the transporter who discharged hazardous waste: 263.30(c)-			
(1) Give notice to the National Response Center (800-424-8802) if required by 49 CFR 171.15?	___	___	_____
(2) Report in writing (if required by 49 CFR 171.16) to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, D.O.T., Washington, DC 20590?	___	___	_____
Did the transporter clean up the H.W. discharge or take all other action as required by Federal, State, or local officials to prevent hazard to human health or the environment? 263.31	___	___	_____
Water (bulk shipment) transporters:			
Did the water (bulk shipment) transporter: 263.20(e)-			
(1) Deliver the H.W. to the designated facility?	___	___	_____
(2) Accompany the waste with a shipping paper containing all manifest information except EPA ID #s, generator certification, and signatures?	___	___	_____
(3) If the delivering transporter, obtain a date of delivery and signature at the designated facility on either the manifest or shipping paper?	___	___	_____
(4) If an intitial transporter, obtain a date of receipt and signature of the water transporter and forward it to the designated facility?	___	___	_____
(5) Retain a copy of the manifest or shipping paper for three years?	___	___	_____

Transporters:
(Part 263 Subpart B, C)

	Yes	No	Comments
If a spill occurred, did the bulk water transporter give notice as required by 33 CFR 153.203 for oil and hazardous substances releases? 263.30(d)	___	___	_____
Shipments of H.W. by rail within the U.S.:			
When accepting H.W. from a non-rail transporter, did the initial transporter of H.W. by rail: 263.20(f)(1)-			
(i) Sign and date the manifest acknowledging acceptance of the H.W.?	___	___	_____
(ii) Return a signed copy of the manifest to the non-rail transporter?	___	___	_____
(iii) Forward at least three copies of the manifest to:			
(A) The next non-rail transporter? or:	___	___	_____
(B) The designated facility? or:	___	___	_____
(C) The last rail transporter designated to handle waste in the U.S.?	___	___	_____
Did the initial rail transporter keep copies of the H.W. manifest or shipping paper for three years after pickup? 263.22(c)(i), 263.20(f)(1)(iv)	___	___	_____
Did the rail transporter ensure that a shipping paper containing all manifest information (except EPA ID #s, generator certification, and signatures) accompanied the waste at all times*? 263.20(f)(2)	___	___	_____
When delivering H.W. to the designated facility, did the rail transporter obtain the date of delivery and a signature? 263.20(f)(3)(i)	___	___	_____
When delivering H.W. to a non-rail transporter, did the rail transporter obtain the date of delivery and a signature from the non-rail transporter? 263.20(f)(4)(i)	___	___	_____
Did the final rail transporter keep copies of the H.W. manifest or shipping paper for three years after delivery? 263.22(c)(ii), 263.20(f)(3)(ii), 263.20(f)(4)(ii)	___	___	_____

* Intermediate rail transporters do not have to sign the papers.